# AIR, PESTICIDES, AND TOXICS 6<sup>TH</sup> FLOOR RECORDS CENTER INFILING / NEW FILE FORM

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	New File		OR	Infiling	×	
Choose from the file type	pes below:		1			
AIR FACILITY:  (				<i>CA</i> :	os Hazard Emergen	су
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CO - Compliance EN - **Enforcer GE - General PE - Permit RA - Regulatory Other	ment	у —		CB - Confide   FI - Site Specific FO - Non Site   IM - **Section   LB - **Lead   PC - **PCB	ntial ecific e Specific	
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#### **Program Management Files:**

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9<sup>th</sup> Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

**EXR** - External Relations

GEO - Geographical Summary Data

**GRA** - Grants Administration

The majority of this section requires the Fiscal Year accompany file code. Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

**OPP - Operating Permits Program** 

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

**RAD** - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

REG - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program





#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 21, 2011

MR FLOYD DICKERSON ENVIRONMENTAL MANAGER RHODIA INC 8615 MANCHESTER ST HOUSTON TX 77012-2142

Re: Permit Amendment Application

Permit Number: 19282 No. 8 Sulfuric Acid Unit Houston, Harris County

Regulated Entity Number: RN100220581 Customer Reference Number: CN600125330

Dear Mr. Dickerson:

The executive director has completed the technical review of your application and has prepared a preliminary decision and draft permit.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A and B)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Notification List
- Draft Permit

Please note that it is **very important** that you follow **all** directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

If you do not comply with all requirements described in the instructions, further processing of your application may be suspended or the agency may take other actions.

MECEIVED

11 OCT -6 PM 3: 56

AIR PERMITS SECTION

Mr. Floyd Dickerson Page 2 September 23, 2011

Re: Permit Number 19282

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Mr. Stephen Anderson, P.E., at (512) 239-1287.

Sincerely,

Bridget C. Bolac

Chief Clerk

Office of the Chief Clerk

Texas Commission on Environmental Quality

BB/SEA

Enclosures

cc: Air Section Manager, Region 12 - Houston

Director, Environmental Public Health Division, Harris County Public Health and Environmental Services, Pasadena

Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston Department of Health and Human Services, Houston

Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 168535

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



#### **EXAMPLE A**

## NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

PERMIT NUMBER: 19282

APPLICATION AND PRELIMINARY DECISION. Rhodia Inc., 8615 Manchester Street, Houston, Texas 77012-2142, has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 19282, which would authorize modification to the No. 8 Sulfuric Acid Unit at 8615 Manchester Street, Houston, Harris County, Texas 77012. This application was submitted to the TCEQ on August 1, 2011. The existing facility will emit the following contaminants: organic compounds, nitrogen oxides, sulfur dioxide, chlorine, sulfuric acid, lead, carbon monoxide and particulate matter including particulate matter with diameters of 10 microns or less and diameters of 2.5 microns or less.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Houston Regional Office, and at the Houston Public Library - Melcher Neighborhood Library, 7200 Keller Street, Houston, Harris County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Houston Regional Office, 5425 Polk Street, Suite H, Houston, Texas.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing. You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the AGENCY CONTACTS AND INFORMATION paragraph below.

RESPONSE TO COMMENTS AND EXECUTIVE DIRECTOR ACTION. After the deadline for public comments, the executive director will consider the comments and prepare a response to all relevant and material or significant public comments. Because no timely hearing requests have been received, after preparing the response to comments, the executive director may then issue final approval of the application. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the Commissioners' Integrated Database (CID).

INFORMATION AVAILABLE ONLINE. When they become available, the executive director's response to comments and the final decision on this application will be accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid. Once you have access to the CID using the above link, enter the permit number for this application which is provided at the top of this notice. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <a href="http://prs.tceq.texas.gov/crintrpt/index.cfm?fuseaction=detail.addnIdDetail&addnid=573791102002159&getall=no#">http://prs.tceq.texas.gov/crintrpt/index.cfm?fuseaction=detail.addnIdDetail&addnid=573791102002159&getall=no#</a>.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www.tceq.texas.gov/about/comments.html, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. If you communicate with the TCEQ electronically, please be aware that your email address, like your physical mailing address, will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Participation and Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Rhodia Inc at the address stated above or by calling Mr. Floyd Dickerson, Environmental Manager, at (713) 924-1408.

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Notice Issuance Date: September 23, 2011

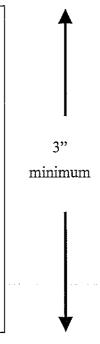
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#### Example B

#### Publication Elsewhere in the Newspaper:

#### TO ALL INTERESTED PERSONS AND PARTIES:

Rhodia Inc. has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 19282, which would authorize modification to the No. 8 Sulfuric Acid Unit at 8615 Manchester St, Houston, Harris County, Texas 77012. Additional information concerning this application is contained in the public notice section of this newspaper.



Minimum 2 column widths or 4 inches

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### Public Notice Checklist

## Notice of Application and Preliminary Decision for an Air Quality Permit (2nd Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

#### Within 33 calendar days after date of this letter

Publish Notice of Application and Preliminary Decision for an Air Quality Permit in the same newspaper(s) in which you published Notice of Receipt of Intent to Obtain Permit for this application.

- Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing.
- Example B (if applicable) must be published in prominent location (other than "public notice") in same issue of newspaper

Provide copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) at a public place for review and copying. Keep them there for duration of the designated comment period.

#### First day of newspaper publication

Review published newspaper notice for accuracy. If errors, contact Air Permits Division.

Ensure copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) are at the public place.

#### Within 10 business days after date of publication

Mail original newspaper clippings showing publication date and newspaper name to:

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team P.O. Box 13087

Austin, Texas 78711-3087

Mail photocopies of newspaper clippings showing publication date and newspaper name to persons listed on *Notification List*.

#### Within 30 calendar days after date of publication

Mail original affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) to:

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team P.O. Box 13087

Austin. Texas 78711-3087

Mail photocopies of affidavits to persons listed on Notification List.

#### Within 10 business days after end of the designated comment period

Mail Public Notice Verification Form to:

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team P.O. Box 13087

Austin, Texas 78711-3087

Mail photocopies of Public Notice Verification Form to persons listed on Notification List.

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



## Instructions for Public Notice For New Source Review Air Permit

#### Notice of Application and Preliminary Decision

We have completed the technical review of your application and issued a preliminary decision. You must comply with the following instructions:

#### **Review Notice**

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

#### **Newspaper Notice**

- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* within 33 calendar days after the date this information was mailed to you (see date of letter).
- You must publish the enclosed Notice of Application and Preliminary Decision for an Air Quality Permit at your expense, in the same newspaper(s) in which you published the Notice of Receipt and Intent to Obtain Permit for this application. The newspaper must be a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper must be of general circulation in the municipality nearest the location.
- You must publish this notice in one issue of any applicable newspaper.
- You will find two example notices enclosed in this package. Example A must be published in the "public notice" section of the newspaper. The phrase "Example A" is not required to be published. Example B must be published in the same issue of the newspaper as Example A; however, it must be published in a prominent location (other than the public notice section). Example B refers the public to the "public notice" section of the newspaper where Example A provides more information regarding the permit application.

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- Example B must be a total of at least 6 column inches (standard advertising units) with a height of at least 3 inches and a horizontal dimension of 2 column widths. If the newspaper chosen does not use standard advertising units for measurement, the notice must be at least 12 square inches with the shortest side of at least 3 inches.
- The bold text of the enclosed notice must be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., bold, italics). Failure to do so may require re-notice.

#### Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is
  required at either the elementary or middle school nearest to the facility or proposed
  facility location. Bilingual education programs are determined on a district-wide basis.
  When students who are required to attend either school are eligible to be enrolled in a
  bilingual education program, some alternative language notice is required (newspaper
  notice).
- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.
- If triggered, publications of alternative language notices must be made in a newspaper or publication printed primarily in each language taught in the bilingual education program. The same newspaper(s) used for Notice of Receipt and Intent to Obtain Permit must be used for publication of the Notice of Application and Preliminary Decision for an Air Quality Permit. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.
- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the *Public Notice Verification Form (Form TCEQ-20244)* indicating

your compliance with the requirements regarding publication in an alternative language. This form is available at www.tceq.texas.gov/permitting/air/nav/air\_publicnotice.html.

- It is suggested the applicant work with the local school district to do the following:
  - (a) determine if a bilingual program is required in the district;
  - (b) determine which language is required by the bilingual program;

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(c) locate the nearest elementary and middle schools; and

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- (d) determine if any students attending either school are entitled to be enrolled in a bilingual educational program.
- If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language. Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication. Electronic versions of the Spanish templates are available through the Air Permits Division Web site at www.tceq.texas.gov/goto/air/publicnotice.
- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

### Public Comment Period

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- The public comment period will last at least 30 calendar days after publication of the last notice.
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.
  - The comment period for the permit may lengthen depending on whether a public meeting is held. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

#### **Proof of Publication**

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.
- For each newspaper in which you published, you must submit original newspaper clippings or tear sheets of each published notice which shows the complete notice that was published, the date of publication, and the name of the newspaper to the TCEQ Office of the Chief Clerk within 10 business days after the date of publication.

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- You must submit an original affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable) to the Office of the Chief Clerk within 30 calendar days after the date of publication. You must use the enclosed affidavit forms. The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the original newspaper clippings described above.
- You must submit the *Public Notice Verification Form (Form TCEQ-20244)* to the Office of the Chief Clerk within 10 business days of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements. This form is available at www.tceq.texas.gov/permitting/air/nav/air publicnotice.html.
- The original affidavits of publication, *Public Notice Verification Form*, and original newspaper clippings of the published notices must be mailed to:

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

- Please ensure that the affidavit and newspaper clippings you send to the Chief Clerk are originals and that all blanks on the affidavit are filled in correctly. Photocopies of newspaper clippings and affidavits will not be accepted.
- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

#### Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. If you fail to publish the notice or submit proof of publication on time, the TCEQ may suspend further processing on your application or take other actions.

#### Sign Posting

Signs must remain in place and be legible and be visible from the street for the entire duration of the comment period, from the beginning of the *Notice of Receipt and Intent* until the close of the comment period after publication of the *Notice of Application and Preliminary Decision*.

#### Application in a Public Place

• You must provide a copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit), at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.

- A public place is one that is publicly owned or operated (ex: libraries, county courthouses, or city halls.)
- This copy must be accessible to the public for review and copying. The copy must be available beginning on the first day of newspaper publication and remain in place until the commission has taken action on the application or the commission refers issues to the State Office of Administrative Hearings.
- If the application is submitted to the TCEQ with information marked as "CONFIDENTIAL," you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."
- You must submit verification of file availability using the Public Notice Verification Form (Form TCEO-20244) within 10 business days after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the application was in a public place during available the entire public comment period. This form www.tceq.texas.gov/permitting/air/nav/air publicnotice.html.

#### General Information

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When contacting the Commission regarding this application, please refer to the permit number at the top of the Notice of Application and Preliminary Decision.

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the project reviewer listed in the cover letter.

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TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team

P.O. Box 13087

Austin, Texas 78711-3087

Applicant Name: Rhodia	

Permit No.: 19282

#### AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS	§
COUNTY OF	§
Before me, the undersigned authority, on th	is day personally appeared
(name of newspaper representative)	, who being by me duly sworn,
deposes and says that (s)he is the(title	of newspaper representative)
of the(name of newspaper)	; that said newspaper is generally circulated
in	, Texas;
(in the municipality or nearest municipality	to the location of the facility or the proposed facility)
that the attached notice was published in sai	d newspaper on the following date(s):
(ne	wspaper representative's signature)
Subscribed and sworn to before me this the	, day of, 20,
to certify which witness my hand and seal o	f office.
(Seal)	Notary Public in and for the State of Texas
	Print or Type Name of Notary Public
	My Commission Expires

TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.		 
Permit No.: <u>19282</u>		 

STATE OF TEXAS		§		
COUNTY OF		§		
Before me, the undersigned	authority, on this da	y personally ap	ppeared	January Company
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and says that (s)he is the	-			
of the(name of newspa	per or publication)	; that said	newspaper or publication	on is generally circulated
in(in the municipality or that the attached notice was			f the facility or the proper blication on the following	
that the attached notice was	published in said ne	wspaper or pu	blication on the following	ng date(s):
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that the attached notice was  Subscribed and sworn to be	published in said ne	(newspaper of day of	blication on the following	ng date(s):
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that the attached notice was  Subscribed and sworn to be	fore me this thehand and seal of off	wspaper or pu  (newspaper of  day of  ice.	blication on the following	ng date(s):  tive's signature)

My Commission Expires

#### NOTIFICATION LIST

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavit of Publication for Air Permitting*, the *Alternative Language Affidavit of Publication for Air Permitting (if applicable)*, and a completed copy of the *Public Notice Verification Form (Form TCEQ-20244)*. Originals should be sent to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. **Copies** should be sent to the following:

U.S. Environmental Protection Agency Region 6 Attn: Air Permits Section (6PD-R) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Texas Commission on Environmental Quality Houston Regional Office 5425 Polk Street, Suite H Houston, Texas 77023-1452 Texas Commission on Environmental Quality Office of Air Air Permits Division, MC-163 Mr. Stephen Anderson, P.E. P.O. Box 13087 Austin, Texas 78711-3087

Bureau Chief Pollution Control & Prevention Environmental Health Division Houston Department of Health and Human Services 7411 Park Place Blvd Houston, Texas 77087-4441

Director
Environmental Public Health Division
Harris County Public Health and
Environmental Services
101 South Richey Street, Suite G
Pasadena, Texas 77506-

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#### SPECIAL CONDITIONS

#### Permit Number 19282 and PSDTX1081

#### **EMISSION STANDARDS**

- 1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
- 2. Sulfur dioxide (SO<sub>2</sub>) emissions limits will be limited to the following emission rates: Short term - 3.0 pounds of SO<sub>2</sub> per ton of one hundred percent acid produced. Long term - 1.7 pounds of SO<sub>2</sub> per ton of one hundred percent acid produced.

There values correlate to hourly and yearly SO<sub>2</sub> emission rates found in the maximum allowable emissions rates table (MAERT) from Emission Point Number (EPN) 101. (PSD) (01/08)

These facilities shall comply with all applicable requirements shall comply with all applicable requirements of EPA regulations on Standards of Performance for New Stationary Sources promulgated for the following: (x/11)

- A. Emission Guidelines and Compliance Times for Sulfuric Acid Production Units in 40 CFR 60, Subparts A and Cd, and
- B. Sulfuric Acid Plants in 40 CFR-60, Subparts A and H.

The sulfur acid mist (H<sub>2</sub>SO<sub>4</sub>) mist limits are limited to 0.15 pound per ton of H<sub>2</sub>SO<sub>4</sub> EPN 101. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> mist emission limits effective on and after July 1, 2009 shall never be relaxed. (PSD) (12/07)

Natural gas use for furnace heat ups are limited to 150 hours per rolling 12 months at a maximum hourly fired duty of 50 MMBtu and shall be emitted through EPNs 103, 105 and 106. Records shall be kept at the plant site and updated once every six months to demonstrate compliance with this representation. Records shall be made readily available to Texas Commission on Environmental Quality (TCEQ) personnel upon request, the U.S. Environmental Protection Agency (EPA) personnel or any applicable local program with jurisdiction. (x/11)

3. H<sub>2</sub>SO<sub>4</sub> production is limited to 2,600 tons per day. The holder of this permit shall keep records of the daily production of H<sub>2</sub>SO<sub>4</sub>. Records shall be made readily available to TCEQ personnel upon request, EPA personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO<sub>2</sub> emissions limitations specified in the MAERT. (PSD) (04/10)

- 4. <u>Piping, Valves, Flanges, Connectors, Pumps and Compressors in Gaseous and Liquid Sulfur Dioxide (SO<sub>2</sub>) Service (12/07)</u>
  - A. Audio, olfactory and visual checks for gas and liquid SO<sub>2</sub> leaks within the operating area shall be made once every shift. This special condition will apply upon start-up of the represented increase in H<sub>2</sub>SO<sub>4</sub> production from the October 2006 amendment submittal.
    - B. Process gas leaks shall be addressed upon detection of a gaseous SO<sub>2</sub> leak by plant personnel who shall take the following actions:

- (1) Locate and determine the extent of the process gas leak.
- (2) Commence to make repairs to the gas leak.

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- (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.
- c. Liquid leaks found in damaged or leaking valves, connectors and pump seals in the SO<sub>2</sub> scrubber authorized in the October 2006 amendment submittal found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair or replace a leaking component as specified in this paragraph within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.
- D. Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made readily available to representatives of the TCEQ or any local program with jurisdiction upon request.

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#### INITIAL DETERMINATION OF COMPLIANCE

5. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Unit No. 8 Stack designated as EPN 101. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. (PSD) (07/07)

- A. Sampling shall be conducted in accordance with Title 40 Code of Federal Regulations (40 CFR) Part 60, Appendix A, Method 7, "Determination of Nitrogen Oxide (NO<sub>x</sub>) Emissions from Stationary Sources" and Method 8, "Determination of SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> Emissions from Stationary Sources" and Method 10, "Determination of Carbon Monoxide (CO) Emissions from Stationary Sources" and other applicable testing methods.
- B. The appropriate TCEQ Regional Office in the region where the source is located and applicable local air program(s) shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the prefest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit provision or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standard testing which must have EPA approval shall be submitted to the TCEQ Field Operations Division in Austin.

- C. Air contaminants emitted from the Unit No. 8 Stack to be tested for include chlorine, SO<sub>2</sub>, H<sub>2</sub>SO<sub>4</sub> mist, CO, NO<sub>x</sub>, antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, silver and thallium. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1 and 2.
  - D. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires prior approval and requests shall be submitted to the TCEQ Field Operations Division in Austin.
    - The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permittee) for the H<sub>2</sub>SO<sub>4</sub> unit at the time of testing. The H<sub>2</sub>SO<sub>4</sub> production rate shall be monitored and recorded during the stack test. If the normal production rate of H<sub>2</sub>SO<sub>4</sub> from this facility exceeds by more than 10 percent the tons per day maintained during sampling, the company must notify, in writing, the appropriate TCEQ Regional Office, and the source may be subject to additional sampling to demonstrate continued compliance
    - One copy of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached conditions of Chapter 14 of the TCEQ <u>Sampling Procedures Manual</u>. The reports shall be distributed as follows:

One copy to the TCEQ Houston Regional Office.

One copy to each appropriate local air pollution control program.

One copy to the EPA Region 6 New Source Review Section in Dallas.

#### CONTINUOUS DETERMINATION OF COMPLIANCE

6. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO<sub>2</sub> and the total gas flow rate from the Unit No. 8 Stack (EPN 101).

- A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ±5 percent from the tagged cylinder gas value.
- B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO<sub>2</sub> per hour at least once every month.
- C. All monitoring data and quality-assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ personnel, EPA personnel of any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO<sub>2</sub> emission limits specified in MAERT.
  - D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments. (12/07)
  - E. CEMS shall be used to demonstrate compliance with the SO<sub>2</sub> emission limits as found in Special Condition No. 2. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the Alternate Monitoring Plan (AMP) (Attachment A). (12/07)
    - (1) The SO<sub>2</sub>CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO<sub>2</sub> emission rate in units of pounds per ton of one hundred percent acid produced.
    - (2) The SO<sub>2</sub> CEMS shall monitor and record the SO<sub>2</sub> emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
    - (3) Implementation of the monitoring requirements has been defined in the AMP for the SO<sub>2</sub> CEMS system.
    - (4) The AMP supersedes the corresponding SO<sub>2</sub> monitoring requirements of NSPS Subpart H.

- (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
- (6) In the event of a CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 2 according to the procedures specified in the AMP.
- 7. The minimum liquid flow to the second stage of the absorber shall be 600 gallons per minute (gpm). The circulation rate shall be monitored and recorded at least once a day.

The liquid flow rate shall be recorded at least once an hour.

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The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

The minimum pH of the scrubbing solution downstream of the Brinks mist filter is 5.0. This pH shall be analyzed and recorded at least once a day.

Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within 0.5 pH unit.

Quality-assured (or valid) data must be generated when the facility generating emissions are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the facility generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

8. The following requirements apply to capture systems for EPN 101. (07/07)

- A. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system;
- B. The control device shall not have a bypass.
- C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.

#### PLANNED MAINTENANCE, STARTUP AND SHUTDOWN

- 9. Catalyst converter planned MSS activity is limited to 512 hours per rolling twelve months from EPN CATSCNU8. Planned MSS generated particulate emissions shall be directed to a bag filter. Outlet bag filter grain loading shall be limited to a maximum of 0.01 grains per dry standard cubic foot. (x/11)
  - Only these planned MSS activities described in this condition are authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the maintenance, start-up, and shutdown (MAERT). The performance of each planned maintenance activity and emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis. These records shall include at least the following information: (x/11)
  - (1) The physical location at which emissions from the planned MSS activity occurred, including the emission point number, common name, and any other identifier for the point at which the emissions were released into the atmosphere;
  - (2) The type of planned MSS activity and the reason for the planned activity;
  - (3) The common name and the facility identification number of the facilities at which the planned MSS activity and emissions occurred;
  - (4) The date and time of the planned MSS activity and its duration;
  - (5) The estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the amendment application, PI-1 dated July 28, 2011, consistent with good engineering practice.

    Dated month day, 2011

# Attachment A Alternative Monitoring Plan for SO<sub>2</sub> Emissions Rhodia Inc. Houston, TX Unit 8 Single Absorption Sulfuric Acid Plant with Scrubber

#### Justification for Using an Alternative Monitoring Plan (AMP) for SO<sub>2</sub> emissions

Sulfur dioxide emissions from the Houston 8 sulfuric acid unit will be monitored in accordance with the requirements of the existing NSPS for sulfuric acid plants except as noted in this AMP. The CEMS will demonstrate compliance on a real-time basis with the SO<sub>2</sub> emissions standard (as lbs of SO2 per ton of 100% sulfuric acid produced) using stack SO<sub>2</sub> and O<sub>2</sub> analyzers. The purpose of this AMP is to document the calculation methods that will be utilized to demonstrate compliance with regulations as modified by the Consent Decree.

#### **Definitions**

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned.

"Long-Term Limit" shall mean a sulfur dioxide (SO<sub>2</sub>) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor maintenance or careless operation.

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

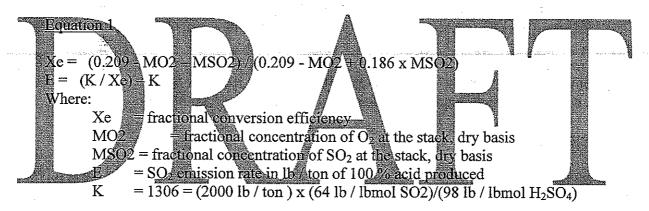
"Short-Term Limit" shall mean the SO<sub>2</sub> emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times.

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases.

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

#### Part 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO<sub>2</sub> and O<sub>2</sub> analyzers at the exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.



#### Short-Term Limit

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for SO<sub>2</sub>.

- At any given time the system will maintain an array consisting of the 36 most recent samples of the O<sub>2</sub> and SO<sub>2</sub> concentrations at the exit stack.
- Once every five minutes, the system will sample the latest O<sub>2</sub> and SO<sub>2</sub> concentrations, add the recent readings to the array and delete the oldest readings. If the unit is not operating then the array of data will not change.
- MO2<sub>3hravg</sub> will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of O<sub>2</sub> at the stack (MO2<sub>3hravg</sub>).

- MSO2<sub>3hravg</sub> will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO<sub>2</sub> at the stack (MSO2<sub>3hravg</sub>).
- The rolling 3 hour average SO<sub>2</sub> emissions (E<sub>3hravg</sub>) will then be calculated per Equation 2.

Equation 2 (rolling 3 hour average 
$$SO_2$$
 emissions)  
 $Xe_{3hravg} = (0.209 - MO2_{3hravg} - MSO2_{3hravg}) / (0.209 - MO2_{3hravg} + 0.186 x$   
 $MSO2_{3hravg}$   
 $E_{3hravg} = (K / Xe_{3hravg}) - K$ 

- The production unit will be deemed to be operating in compliance with the Short Term Limit if E<sub>3hr-avg</sub> does not exceed 3.0 lb of SO<sub>2</sub> per ton of 100% sulfuric acid produced during all Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the  $O_2$  or  $SO_2$  monitors, the  $O_2$  or  $SO_2$  measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

#### Long-Term Limit

The following method will be used to calculate the daily average lb of SO<sub>2</sub> per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the O<sub>2</sub> and SO<sub>2</sub> concentrations at the exit stack will be sampled and this time will be counted as five operating minutes. If the unit is not operating, then the O<sub>2</sub> and SO<sub>2</sub> concentrations will not be sampled.
- The daily average will be calculated as follows for each calendar day:

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- o MO2<sub>daily avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of  $O_2$  at the stack.
  - o MSO2<sub>daily avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of SO<sub>2</sub> at the stack
- o E<sub>(daily avg)</sub> will then be calculated using Equation 3.

Equation 3 (daily average  $SO_2$  emissions)  $Xe_{daily avg} = (0.209 - MO2_{daily avg} - MSO2_{daily avg}) / (0.209 - MO2_{daily avg} + 0.186 \times MSO2_{daily avg})$ 

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$$E_{\text{daily avg}} = (K / Xe_{\text{daily avg}}) - K$$

- o The number of operating minutes for the day will be summed  $(T_{day},)$
- E<sub>dayavg</sub> and T<sub>day</sub> will be used to calculate a 365-day rolling average of lb/ton. The
  daily averages will be weighted by the number of operating minutes per day, as
  per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO<sub>2</sub> emission rate will be calculated using Equation 4.

$$E_{365avg} = \sum \frac{E_{dayavg} * T_{day}}{\sum T_{day}}$$

The production unit will be defined to be operating in compliance with the Long-Term Limit if  $E_{365avg}$  does not exceed 1.7 b of  $SO_2$  per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the  $O_2$  or  $SO_2$  monitors, the  $O_2$  or  $SO_2$  measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunction, breakdowns, and repairs:

#### Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup.

An equivalent analyzer may be substituted for any reason.

Location	Manufacturer	Model Number	Range
Stack SO <sub>2</sub>	Ametek Photometric Analyzer (or equivalent)	920 (or equivalent)	Dual range:  Normal: 0-500 ppm SO <sub>2</sub> SSM: 0-3,600 ppm  SO <sub>2</sub>
Stack O <sub>2</sub>	Ametek Oxygen Analyzer (or equivalent)	920 (or equivalent)	Single range: $0 - 20.9 \% O_2$

#### Pt. 60, App. B, Spec. 2, Section 1.0 (Stack Analyzers)

Initial compliance certification required only of the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

#### System Maintenance and Malfunction

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above

In the event of a CEMS malfunction of greater than 24 hours:

- SO<sub>2</sub> in the exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Reich test or other method (e.g. portable analyzer).
- O<sub>2</sub> in the exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Orsat test or other method (e.g. portable analyzer)
- Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exception. Given that one or both of the stack CEMS is out of service, the most recent hourly reading(s) will be substituted for the 12 (24) five-minute readings that would otherwise be taken if the system was operating normally

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

#### **System Modifications**

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector -

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

Dated month day, 2011

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#### EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

#### Permit Number 19282 and PSDTX1081

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

#### AIR CONTAMINANTS DATA

Emission	Source	Air Contaminant	Emission Ra	tes *
Point No. (1)	Name (2)	Name (3)	lb/hr 🔪 🔝	TPY**
	• •	. ,		
101	Unit No. 8 Stack	CO	1.75	7.65
		$H_2SO_4(6)$	16.25	71.18
		$NO_x$	9.75	42.70
		PM	3.36	14.72
		$PM_{10}$	3.36	14.72
		≥ PM <sub>2.5</sub>	3.36	14.72
Strain Control of the	and the second of the second o	\$02	325.03	806.65
		Ag	0.022	0.095
		As 📜	0.068	0.297
		<b>B</b> a 🖣	0.023	0.099
		<b>∖</b> Be	0.014	0.063
		Çd	0.014	0.063
		Cl <sub>2</sub>	0.721	3.159
		Cr	0.077	0.337
		Hg	0.0004	0.002
		Ni	0.061	0.267
		Pb	0.032	0.141
		Sb	0.037	0.158
		Se	0.044	0.192
		Tl	0.014	0.063
102	Acid Pump Tank	$SO_2$	0.01	0.01

#### AIR CONTAMINANTS DATA

Emission	- Source Spanner Control A	Air Contaminant	Emission Ra	tes *
	Name (2)			
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103 a mate, sin	Natural Gas Start Up Vent (8)	Paul CO, and the second of		Long Francisco State (18)
		$NO_x$	<b>4.</b> 90	
Late Broken Company	BY SEE SEE	PM	0.37	
		$PM_{10}$	0.37	
		PM <sub>2.5</sub>	0.37	
		SO <sub>2</sub>	0.03	
	•	VOC	0.27	•
	25 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -			
105	Natural Gas Start Up Vent (8)	CO	4.12	
	1 A 871	$NO_x$	4.90	
M.A.	$\mathcal{A}^{\mathcal{A}}$	PM	0.37	
and the second		$PM_{10}$	0.37	•
sada		$PM_{2.5}$	0.37	
		$SO_2$	0.03	
84. <sup>1</sup>		VOC	0.27	
<b>♦</b> ×				
106	Natural Gas Start Up Vent (8)	>£0>	4.12	
		NO <sub>x</sub>	4.90	
		PM	0.37	
		$PM_{10}$	0.37	
		PM <sub>2.5</sub>	0.37	
· · · · · · · · · · · · · · · · · · ·	er vi	$SO_2$	0.03	
4 · *		VOC	0.27	
		4		
	Annual Emission Cap (5)	CO	gi. C	0.31
	(EPNs 103, 105 and 106)	NO <sub>x</sub>		0.37
		PM		0.03
		$PM_{10}$	The second secon	0.03
		$PM_{2.5}$		0.03
		SO <sub>2</sub>		0.01
		VOC	N.	0.02
CATCONT 10	Committee (7)	DM (	0.01	0.01
CATSCNU8	Catalyst Screening (7)	PM	0.01	0.01
		$PM_{10}$	0.01	0.01
		$PM_{2.5}$	0.01	0.01

#### AIR CONTAMINANTS DATA

Emission	Source	Air Contaminant Emission Rates *
Point No. (1)	Name (2)	Name (3) lb/hr TPY**
FE1	Process Fugitives (4)	$SO_2$ 0.01 0.03

- (1) Emission point identification either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources use area name or fugitive source name.
- (3) Ag silver
  - As arsenic
  - Ba barium
  - Be beryllium
  - Cd cadmium
  - Cl<sub>2</sub> chlorine
  - CO carbon monoxide
  - Cr chromium
  - Hg mercury
  - H<sub>2</sub>SO<sub>4</sub> sulfuric acid mist
  - Ni nickel
  - NO<sub>x</sub> total oxides of nitrogen
  - Pb lead
  - PM total-particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented PM<sub>10</sub> total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented
  - PM<sub>2</sub> particulate matter equal to or less than 2.5 microns in diameter
  - Sb antimony
  - Se = selenium
  - SO<sub>2</sub> sulfur dioxide
  - Tl thallium
  - VOC volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (5) 150 hours of operation on a rolling 12-month basis for EPNs 103, 105 and 106.
- (6) PSDTX1081 pollutant.
- (7) Planned maintenance, startup and shutdown activity only
- (8) Planned startup activity only

#### AIR CONTAMINANTS DATA

Emission	Source	Air Contaminant	Emission	Rates *	
Point No. (1)	Name (2)	Name (3)	lb/hr	TPY**	

\* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/day 24 Days/week 7 Weeks/year 52

\*\* Compliance with annual emission limits is based on a rolling 12-month period.

Dated month day, 2011

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# AIR, PESTICIDES, AND TOXICS 6<sup>TH</sup> FLOOR RECORDS CENTER INFILING / NEW FILE FORM

New File		OR	Infiling	
Choose from the file types below:	-			•
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( CB - Confidential Business				Asbestos or Asbestos
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GE - General			) FO - Non Site	-
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RA - Regulatory Applicability	-	Ţ	LB - **Lead	
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#### Program Management Files:

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9<sup>th</sup> Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

**EXR** - External Relations

GEO - Geographical Summary Data

**GRA** - Grants Administration

The majority of this section requires the Fiscal Year accompany file code. Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

Sept & Street March

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

**OPP - Operating Permits Program** 

**PEA - Permits Administration Program** 

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

**REG** - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program

SPA

Bryan W. Shaw, Ph.D., Chairman Buddy Garcia, Commissioner Carlos Rubinstein, Commissioner Mark R. Vickery, P.G., Executive Director



#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 5, 2011

MR WILLIAM J MCCONNELL PLANT MANAGER RHODIA INC 8615 MANCHESTER ST HOUSTON TX 77012-2142

Re: Prevention of Significant Deterioration Permit

Permit Numbers: 4802 and PSDTX1260

Regeneration Unit No 2 Houston, Harris County

Regulated Entity Number: RN100220581 Customer Reference Number: CN600125330 11 DEC 13 PM 5: 19
AIR PERMITS SECTION

Dear Mr. Mcconnell:

The executive director has completed the technical review of your application and has prepared a preliminary decision and draft permit.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A and B)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Notification List
- Draft Permit

Please note that it is **very important** that you follow **all** directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

Mr. William J Mcconnell Page 2 December 5, 2011

Re: Permit Numbers 4802 and PSDTX1260

If you do not comply with all requirements described in the instructions, further processing of your application may be suspended or the agency may take other actions.

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Mr. Stephen Anderson, P.E. at (512) 239-1287.

Sincerely,

Budget C. Bohar
Bridget C. Bohar

Chief Clerk

Office of the Chief Clerk

Texas Commission on Environmental Quality

BB/SEA

Enclosure

cc: Air Section Manager, Region 12 - Houston

Director, Environmental Public Health Division, Harris County Public Health and Environmental Services, Pasadena

Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston Department of Health and Human Services, Houston

Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

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Project Numbers: 166270 and 166724

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



#### **EXAMPLE A**

## NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

AIR QUALITY PERMIT NUMBERS: 4802 AND PSDTX1260

APPLICATION AND PRELIMINARY DECISION. Rhodia Inc., 8615 Manchester St, Houston, Texas 77012-2142, has applied to the Texas Commission on Environmental Quality (TCEQ) for amendment of Air Quality Permit 4802 and issuance of Prevention of Significant Deterioration (PSD) Air Quality Permit PSDTX1260, which would authorize construction of a caustic scrubber at the Regeneration Unit No 2 at 8615 Manchester St, Houston, Harris County, Texas 77012. This application was submitted to the TCEQ on June 6, 2011. The existing facility will emit the following air contaminants in a significant amount: sulfuric acid mist. In addition, the facility will emit the following air contaminants. organic compounds, nitrogen oxides, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide, carbon monoxide, sulfuric acid, hydrogen chloride and chlorine.

The executive director has determined that the emissions of air contaminants from the proposed facility which are subject to PSD review will not violate any state or federal air quality regulations and will not have any significant adverse impact on soils, vegetation, or visibility. All air contaminants have been evaluated, and "best available control technology" will be used for the control of these contaminants.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ central office, the TCEQ Houston regional office, and at the Melcher Neighborhood Library, 7200 Keller Street, Houston, Harris County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Houston Regional Office, 5425 Polk St Ste H, Houston, Texas.

INFORMATION AVAILABLE ONLINE. These documents are accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid: the executive director's preliminary decision which includes the draft permit, the executive director's preliminary determination summary, the air quality analysis, and, once available, the executive director's response to comments and the final decision on this application. Access the Commissioners' Integrated Database (CID) using the above link and enter the permit number for this application. The public location mentioned above provides public access to the internet. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <a href="http://prs.tceq.texas.gov/crintrpt/index.cfm">http://prs.tceq.texas.gov/crintrpt/index.cfm</a>? fuseaction=detail.addnIdDetail&addn\_id=580791102002159&getall=no#.

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PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application, if requested by an interested person, or if requested by a local legislator. A public meeting is not a contested case hearing. You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the AGENCY CONTACTS AND INFORMATION paragraph below.

After the deadline for public comment, the executive director will consider the comments and prepare a response to all public comment. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application.

OPPORTUNITY FOR A CONTESTED CASE HEARING. A contested case hearing is a legal proceeding similar to a civil trial in a state district court. A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. A contested case hearing request must include the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "I/we request a contested case hearing;" (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; and (6) a description of how you use the property which may be impacted by the facility. If the request is made by a group or association, then one or more members who have standing to request a hearing and the interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns. Requests for a contested case hearing must be submitted in writing within 30 days following this notice to the Office of the Chief Clerk, at the address provided in the information section below.

A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decisions on the application. Further, the Commission will only grant a hearing on issues raised by you or others during the public comment period that have not been withdrawn. Issues that are not raised in public comments may not be considered during a hearing.

**EXECUTIVE DIRECTOR ACTION.** If a timely contested case hearing request is not received or if all timely contested case hearing requests are withdrawn, the executive director may issue final approval of the application. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the CID. If any timely hearing requests are received and not withdrawn, the executive director will not issue final approval of the permit and will forward the application and requests to the Commissioners for their consideration at a scheduled commission meeting.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

**AGENCY CONTACTS AND INFORMATION.** Public comments and requests must be submitted either electronically at www.tceq.texas.gov/about/comments.html, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. If you communicate with the TCEQ electronically, please be aware that your email address, like your physical mailing

address, will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040. transi nyi tiya esi a sa ki sa qa a siggina ili a li a a sa sa

Further information may also be obtained from Rhodia Inc at the address stated above or by calling Mr. Floyd Dickerson, Environmental Manager at (713) 924-1408. 

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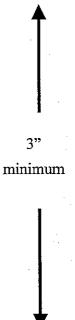
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#### Example B

#### Publication Elsewhere in the Newspaper:

#### TO ALL INTERESTED PERSONS AND PARTIES:

Rhodia Inc. has applied to the Texas Commission on Environmental Quality (TCEQ) for amendment of Air Quality Permit Number 4802 and issuance of Prevention of Significant Deterioration (PSD) Air Quality Permit PSDTX1260, which would authorize construction of a caustic scrubber at the Regeneration Unit No 2 at 8615 Manchester St, Houston, Harris County, Texas 77012. Additional information concerning this application is contained in the public notice section of this newspaper.



→ Minimum 2 column widths or 4 inches

## Public Notice Checklist Notice of Application and Preliminary Decision for an Air Quality Permit (2nd Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

#### Within 33 calendar days after date of this letter

Publish Notice of Application and Preliminary Decision for an Air Quality Permit in the same newspaper(s) in which you published Notice of Receipt of Intent to Obtain Permit for this application.

- Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing.

- Example B (if applicable) must be published in prominent location (other than "public notice") in same issue of newspaper

Provide copy of the complete application, the executive director's preliminary decision (including the draft permit), and the executive director's preliminary determination summary and executive director's air quality analysis, including any revisions, at a public place for review and copying. Keep them there for duration of the designated comment period. The public place should provide public access to the internet.

#### First day of newspaper publication

Review published newspaper notice for accuracy. If errors, contact Air Permits Division. Ensure copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) are at the public place.

#### Within 10 business days after date of publication

Mail original newspaper clippings showing publication date and newspaper name to:

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team

P.O. Box 13087

Austin, Texas 78711-3087

Mail photocopies of newspaper clippings showing publication date and newspaper name to persons listed on *Notification List*.

#### Within 30 calendar days after date of publication

Mail original affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) to:

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team

P.O. Box 13087

Austin, Texas 78711-3087

Mail photocopies of affidavits to persons listed on Notification List.

#### Within 10 business days after end of the designated comment period

Mail Public Notice Verification Form to:

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team

P.O. Box 13087

Austin, Texas 78711-3087

Mail photocopies of Public Notice Verification Form to persons listed on Notification List.

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



## Instructions for Public Notice For New Source Review & Prevention of Significant Deterioration Air Permit

#### Notice of Application and Preliminary Decision

We have completed the technical review of your application and issued a preliminary decision. You must comply with the following instructions:

#### **Review Notice**

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

#### **Newspaper Notice**

- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* within **33 calendar days** after the date this information was mailed to you (see date of letter).
- You must publish the enclosed Notice of Application and Preliminary Decision for an Air Quality Permit at your expense, in the same newspaper(s) in which you published the Notice of Receipt and Intent to Obtain Permit for this application. The newspaper must be a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper must be of general circulation in the municipality nearest the location.
- You must publish this notice in one issue of any applicable newspaper.
- You will find two example notices enclosed in this package. *Example A* must be published in the "public notice" section of the newspaper. The phrase "Example A" is not required to be published. *Example B* must be published in the **same issue** of the newspaper as *Example A*; however, it must be published in a prominent location (other than the public notice section). *Example B* refers the public to the "public notice" section of the newspaper where *Example A* provides more information regarding the permit application.

- Example B must be a total of at least 6 column inches (standard advertising units) with a height of at least 3 inches and a horizontal dimension of 2 column widths. If the newspaper chosen does not use standard advertising units for measurement, the notice must be at least 12 square inches with the shortest side of at least 3 inches.
- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold**, *italics*). **Failure to do so may require re-notice.**

#### Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is
  required at either the elementary or middle school nearest to the facility or proposed
  facility location. Bilingual education programs are determined on a district-wide basis.
  When students who are required to attend either school are eligible to be enrolled in a
  bilingual education program, some alternative language notice is required (newspaper
  notice).
- Since the school district, and not the schools, must provide the bilingual education
  program, these programs do not have to be located at the elementary or middle school
  nearest to the facility or proposed facility to trigger the alternative language notice
  requirement. If there are students who would normally attend the nearest schools
  eligible to be taught in a bilingual education program at a different location, alternative
  language notice is required.
- If triggered, publications of alternative language notices must be made in a newspaper or publication printed primarily in each language taught in the bilingual education program. The same newspaper(s) used for Notice of Receipt and Intent to Obtain Permit must be used for publication of the Notice of Application and Preliminary Decision for an Air Quality Permit. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.
- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the *Public Notice Verification Form (Form TCEQ-20244)* indicating your compliance with the requirements regarding publication in an alternative

language. This form is available at www.tceq.texas.gov/permitting/air/nav/air\_publicnotice.html.

- It is suggested the applicant work with the local school district to do the following:
  - (a) determine if a bilingual program is required in the district;
  - (b) determine which language is required by the bilingual program;
  - (c) locate the nearest elementary and middle schools; and
  - (d) determine if any students attending either school are entitled to be enrolled in a bilingual educational program.
- If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language. Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication. Electronic versions of the Spanish templates are available through the Air Permits Division Web site at www.tceq.texas.gov/goto/air/publicnotice.
- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

#### **Public Comment Period**

- The public comment period will last at least 30 calendar days after publication of the last notice.
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.
- The comment period for the permit may lengthen depending on whether a public meeting is held. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

#### **Proof of Publication**

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.
- For each newspaper in which you published, you must submit **original newspaper clippings or tear sheets** of each published notice which shows the complete notice that was published, the date of publication, and the name of the newspaper to the Office of the Chief Clerk within **10 business days** after the date of publication.
- You must submit an original affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable) to the

Office of the Chief Clerk within 30 calendar days after the date of publication. You must use the enclosed affidavits of publication. The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the original newspaper clippings described above.

- You must submit the Public Notice Verification Form (Form TCEQ-20244) to the Office of the Chief Clerk within 10 business days of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements. This form is available at www.tceq.texas.gov/permitting/air/nav/air publicnotice.html.
- The original affidavits of publication, Public Notice Verification Form, and original newspaper clippings of the published notices must be mailed to:

Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

- Please ensure that the affidavit and newspaper clippings you send to the Chief Clerk are originals and that all blanks on the affidavit are filled in correctly. Photocopies of newspaper clippings and affidavits will not be accepted. Dispersion's services and the contract
- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

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#### Failure to Publish and Submit Proof of Publication

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You must meet all publication requirements. If you fail to publish the notice or submit proof of publication on time, the TCEQ may suspend further processing on your application or take other actions.

#### Sign Posting

Signs must remain in place and be legible and be visible from the street for the entire duration of the comment period, from the beginning of the Notice of Receipt and Intent until the close of the comment period after publication of the Notice of Application and Preliminary Decision. and the common the state of the

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#### Application in a Public Place

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• You must provide a copy of the complete application, the executive director's preliminary decision (including the draft permit), the executive director's preliminary determination summary and the executive director's air quality analysis, (including any subsequent revisions), at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.

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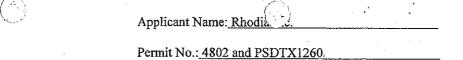
- A public place is one that is publicly owned or operated (ex: libraries, county courthouses, or city halls). Location selected must provide public access to the internet.
- This copy must be accessible to the public for review and copying. The copy must be available beginning on the first day of newspaper publication and remain in place until the commission has taken action on the application or the commission refers issues to the State Office of Administrative Hearings.
- If the application is submitted to the TCEQ with information marked as "CONFIDENTIAL," you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."
- You must submit verification of file availability using the *Public Notice Verification* Form (Form TCEQ-20244) within 10 business days after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the application was in a public place during the entire public comment period. This form is available at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_publicnotice.html">www.tceq.texas.gov/permitting/air/nav/air\_publicnotice.html</a>.

#### **General Information**

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Preliminary Decision*.

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the project reviewer listed in the cover letter.

TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087



#### AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

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	Notary Public in and for the State of Texas
	Notary Public in and for the State of Texas  Print or Type Name of Notary Public

TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Applicant Name: Rhodia Iu.	<del></del>	
Permit No.: 4802 and PSDTX1260		

### ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS	§
COUNTY OF	§
Before me, the undersigned authority, on this	s day personally appeared
	, who being by me duly sworn, deposes
(name of newspaper or publication represent	tative)
and says that (s)he is the	(title of newspaper or publication representative)
	(title of newspaper or publication representative)
of the	; that said newspaper or publication is generally circulated on)
(name of newspaper or publication	on)
in	, Texas; , as the location of the facility or the proposed facility)
	(newspaper or publication representative's signature)
Subscribed and sworn to before me this the	day of, 20,
to certify which witness my hand and seal or	f office.
	Notary Public in and for the State of Texas
(Seal)	
	Print or Type Name of Notary Public
	My Commission Expires

#### **Notification List**

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the Affidavit of Publication for Air Permitting, the Alternative Language Affidavit of Publication for Air Permitting (if applicable), and a completed copy of the Public Notice Verification Form (Form TCEQ-20244). Originals should be sent to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Copies should be sent to the following:

U.S. Environmental Protection Agency Region 6 Attn: Air Permits Section (6PD-R) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Texas Commission on Environmental Quality Houston Regional Office 5425 Polk St Ste H Houston, Texas 77023-1452

Texas General Land Office Upland Leasing Team Leader Professional Services P.O. Box 12873 Austin, Texas 78711-2873 Texas Commission on Environmental Quality Office of Air Air Permits Division, MC-163 Mr. Stephen Anderson, P.E. P.O. Box 13087 Austin, Texas 78711-3087

Bureau Chief Pollution Control & Prevention Environmental Health Division Houston Department of Health and Human Services 7411 Park Place Blvd Houston, Texas 77087-4441

Director
Environmental Public Health Division
Harris County Public Health and
Environmental Services
101 S Richey St Ste G
Pasadena, Texas 77506

#### SPECIAL CONDITIONS

#### Permit Number 4802/PSDTX1260

#### **Emission Standards**

- 1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources- Maximum Allowable Emission Rates" (MAERT), and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
- 2. Complaints from affected persons of nuisance odors from the site verified by the Texas Commission on Environmental Quality (TCEQ) or any air pollution control agency with appropriate jurisdiction shall be the basis for requiring prompt remedial action to eliminate such odors. The TCEQ may require these facilities to implement one or more of the following measures: temporary production curtailment; temporary shutdown during adverse meteorological conditions; install any additional controls that are necessary to control odor emissions, etc., according to a schedule determined by ICEQ. (08/10)
- 3. The sulfur dioxide (SO<sub>2</sub>) emissions from Regeneration Unit No. 2 shall not exceed 15 tons measured over any continuous 24-hour period prior to April 1, 2014. The holder of this permit shall maintain equipment as described in its permit application which will automatically cause the operation of Regeneration Unit No. 2 to cease if the SO<sub>2</sub> emissions exceed for a 30-minute period at a rate which would cause more than 15 tons of SO<sub>2</sub> to be emitted over a 24-hour period prior to April 1, 2014. (x/12)

 $SO_2$  emission limits will be limited to the following emission rates: (x/12)

Short term: 3.0 pounds of SO<sub>2</sub> per ton of one hundred present acid produced. Long term: 1.8 pounds of SO<sub>2</sub> per ton of one hundred percent acid produced. Long term SO<sub>2</sub> emission limits will become effective 365 days from April 1, 2014.

H<sub>2</sub>SO<sub>4</sub> mist is limited to 0.15 pound per ton of produced H<sub>2</sub>SO<sub>4</sub> on an hourly maximum basis and 0.10 pounds per ton of produced H<sub>2</sub>SO<sub>4</sub> on an annual average basis prior to April 1, 2014 from EPN 104. EPN 104 shall be permanently shut down prior to April 1, 2014. H<sub>2</sub>SO<sub>4</sub> mist is limited to 0.15 pound per ton of produced H<sub>2</sub>SO<sub>4</sub> on an hourly maximum basis and 0.10 pounds per ton of produced H<sub>2</sub>SO<sub>4</sub> on an annual average basis on and after April 1, 2014 from EPN 104 upon installation completion of the proposed emission abatement equipment. New EPN 104 shall be operable on and after April 1, 2014. (x/12) (PSD)

Failure to install this emission abatement equipment by April 1, 2014 shall require operation of these permitted facilities to cease and these permitted facilities shall not operate until this abatement equipment is installed and operating properly. (x/12) (PSD)

H<sub>2</sub>SO<sub>4</sub> production is limited 969 tons per day prior to completion of installation and operation of the represented emission abatement equipment pursuant to this special condition. The increase in H<sub>2</sub>SO<sub>4</sub> production to 1,150 tons per day shall not be effective until all represented emission abatement equipment required by this special condition is completely installed and operating properly. (x/12) (PSD)

The holder of this permit shall keep records of the daily production of H<sub>2</sub>SO<sub>4</sub> and the one-hour SO<sub>2</sub> emissions rates for each day before and after completion of installation of the emission abatement equipment required by this special condition. Records shall be made readily available to TCEQ personnel upon request, EPA personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO<sub>2</sub> emissions limitations specified in the maximum allowable emissions rates table (MAERT). (x/12) (PSD)

4. Opacity of emissions from the Unit No. 2 Stack shall not exceed 20 percent averaged over a five minute period up to April 1, 2014.

#### Federal Program Requirements

- 5. These facilities shall comply with all applicable requirements shall comply with all applicable requirements of ERA regulations on Standards of Performance for New Stationary Sources promulgated for the following. (x/12)
  - A. Emission Guidelines and Compliance Times for Sulfuric Acid Production Units in 40 CFR 60, Subparts A and Cd.
  - B. Standards of Performance for Sulfuric Acid Plants in 40 CFR 60, Subparts A and H.
  - C. Volatile Organic Liquid Storage Vessels in 40 CFR Part 60, Subparts A and Kb only apply to Storage Tanks 48, 49, 53, B1 and B2.

These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants promulgated for Benzene Waste Operations in Title 40 Code of Federal Regulations (40 CFR) Part 61, Subparts A and FF.

These facilities shall comply with all applicable requirements of Title 30 Texas Administrative Code (30 TAC) § 113.120 (including the referenced requirements contained in 40 CFR Part 63, Subpart G, § 113.550 (including the referenced requirements contained in 40 CFR Part 63 Subpart XX) and 113.640 (including the referenced requirements contained in 40 CFR Part 63, Subpart GGG). (12/08)

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#### Operational Requirements

- 6. The No. 2 regeneration heater is limited to 1,000 hours per rolling 12-months of operation. Fuel for this heater is limited to pipeline-quality, sweet natural gas as defined in 30 TAC Chapter 101. Records shall be updated quarterly to demonstrate compliance with this special condition.
- 7. The use of compounds at the Regeneration Unit No. 2 (EPN 104) is limited to those identified in the attached Approved Chemical List. Modifications or construction of new facilities at this site that result in emission increases of one or more chemicals in the Approved Chemical List dated December 2008, or from chemicals currently in use and previously authorized through this special condition can only be approved through use of this special condition. Any construction of new equipment that occurs through the use of adding a new chemical is not allowed through this special condition. New chemical(s) may also be added through use of a permit by rule claim and/or registration under 30 TAC Chapter 106 or use of the qualified facilities requirements in 30 TAC Chapter 106 (12/08)
  - A. Short-term (pounds per hour [lb/hr]) and annual (tons per year) emissions and calculations shall be completed for each chemical at each affected source; emission rates shall be calculated in accordance with the methods documented in the permit amendment application (PI-1 dated September 4, 2003). The calculated emission rates shall not exceed the maximum allowable emission rate at any emission point.
  - B. The Effect Screening Level (ESL) for the chemical shall be obtained from the current Texas Commission on Environmental Quality (TCEQ) ESL list or by written request to the TCEQ Toxicology Section.
  - C. The total emissions of any compound from all emission points in this permit must satisfy one of the following conditions:
    - (1) The total maximum emission rate from all sources is less than 0.04 lb/hr and the ESL greater than 2 ug/m³; or
    - (2) Case specific criteria based on modeling performed on July 30, 2004.

 $(ER/ESL)_N \le (ER/ESL)_E$ 

- (ER/ESL)<sub>N</sub> = plant-wide maximum hourly emission rate based on maximum vapor pressure of new compound(s) divided by its ESL.
- (ER/ESL)<sub>E</sub> = the highest ratio of any previously authorized compounds plant-wide hourly emission rate based on maximum vapor pressure divided by its ESL (i.e., 0.261).
- D. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:
- (1) Chemical name(s), composition, and chemical abstract registry number if available.

  (2) Molecular weight.

  (3) Storage tanks, loading areas, and loading fugitive areas where the material is to be handled and the emission control device to be utilized.

  (4) Date new compound handling commenced.

  (5) Material Safety Data Sheet.

  (6) A copy of the referenced July 2004 modeling report shall be kept on-site and made available to TCEQ personnel and any local air pollution program with jurisdiction.

#### Planned Maintenance, Startup and Shutdown (MSS)

8. A. This permit authorizes emissions from spent sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) Storage
Tanks 48, 49, 53 and 56 and from four spent H<sub>2</sub>SO<sub>4</sub> storage tank truck
depressurizations in any one hour and 12,786 spent H<sub>2</sub>SO<sub>4</sub> storage tank truck
depressurizations in any rolling 12 months when the Regeneration Unit No. 2
Furnace, EPN 104, is shut down for the following planned maintenance, start-up,
and shutdown (maintenance, start-up and shutdown) activities: (08/10)

Planned unit shut down for process equipment gas leak repairs, planned maintenance turnarounds and general plant preventative planned maintenance shutdowns up to a maximum of 1,314 hours per rolling 12 months.

During these planned downtime events, the emissions from the listed fixed-roof storage tanks and spent tank truck depressurizing activities shall be routed to the existing caustic scrubber and then directed to the inlet of Vapor Combustor, EPN 170, up to 1,314 hours per rolling 12-months.

A maximum of eight railcars can be depressurized at any one time, and the depressurizing vent stream(s) shall be vented to the No. 2 Regeneration Furnace designated as EPN 104 and can be directed to the caustic scrubber and then vented from the caustic scrubber to the Vapor Combustor identified as EPN 170 when the No. 2 Regeneration Furnace is down. The number of railcars depressurized in a rolling 12-month period is limited to 910 and shall be vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the caustic scrubber and then vented from the caustic scrubber to a Vapor Combustor identified as EPN 170 when the No. 2 Regeneration Furnace is down up to 1,314 hours per calendar year. (x/12)

The Vapor Combustor, EPN 120, shall receive waste gas streams when the Regeneration Unit No. 2 Furnace is not operating up to 1.314 hours per rolling 12-month period. A maximum of two hazardous waste tank trucks can be depressurized in any one hour and 550 truck depressurizations in any rolling 12-month period and vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is down up to 1,314 hours per calendar year.

A maximum of two hazardous waste railcars can be depressurized in any one hour and 65 railcar depressurizations in any rolling 12-month period and vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is down up to 1,314 hours per calendar year.

Emissions from planned unit shutdown for process gas leak repairs at EPN 104 planned maintenance turnarounds at EPN 104 and general plant preventative planned maintenance shutdowns at EPN 104 will be directed to EPN 120 up to a maximum of 1,314 hours per rolling 12-months.

B. This permit authorizes emissions from EPNs 170, TKINSPMSS1, and TKINSPMSS2 for the following planned MSS activities at Storage Tanks 48, 49, 53, 56, and 78. (08/10)

A maximum of three inspections can be conducted for the group of spent acid Storage Tanks designated as 48, 49, 53, and 56 each calendar year and a maximum of two inspections can be conducted for spent acid Storage Tank 78 each calendar year. Any liquid or solid residual from each storage tank will be removed prior to or after each tank is degassed. The represented tank degassing is limited to 1,032 hours per rolling 12 months.

Any gas or vapor removed from process equipment or storage vessels must be routed to the Regeneration Unit No. 2 caustic scrubber for removal of sulfur dioxide at 99.9 percent immediately followed by the vapor combustor designated as EPN 170 for control of volatile organic compounds (VOC) at 98.0 percent (option one) or alternatively to a portable caustic scrubber for removal of SO<sub>2</sub> at 99.0 percent immediately followed by a portable vapor combustor for VOC destruction at 98.0 percent (option two). The portable caustic scrubber pH shall be kept at a minimum of 9.0 and shall be monitored once a day. A sufficient inventory of fresh caustic shall be kept on site during the use of the portable caustic scrubber when each storage tank undergoes a planned MSS activity.

Option one controls shall not be used to degas Storage Tanki 78. Options one and two operating time is each limited to 360 hours per rolling 12 months for Storage Tanks 48, 49, 53, and 56. Option two operating time is limited to 672 hours per rolling 12 months for Storage Tank 78.

Option one or option two control must be maintained until the VOC concentration is less than 34,000 parts per million volume (ppmv) as methane in the storage tank undergoing planned MSS. Each represented storage tank shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the designated option one and/or option two represented emission controls to the extent allowed by process equipment or storage vessel design. The locations and/or identifiers where the purge or liquid flush material enters the storage vessel and the exit points for the exhaust gases shall be recorded.

C. This permit authorizes emissions from EPNs (MSS-HAZTK1 and MSS-HAZTK2) for the following planned MSS activities at Hazardous Waste Tanks (B1, B2, F2, F3, H1 and H2) and bullet tank T554: (12/08)

A maximum of two shutdowns, degassing, and cleaning events can be conducted for Tanks F2, F3, and T554 and two shutdowns, degassing, and cleaning events for tanks the equivalent size of Tanks B1 or B2 and two shutdowns, degassing, and cleaning events for tank the equivalent size of H1 or H2 each calendar year. These tank MSS activities are limited to 840 hours per rolling 12 months.

Each tank will be degassed to EPN 104, prior to being drained and flushed. Each tank will be drained and flushed by water a minimum of three times and emissions must be routed to the Regeneration Unit No. 2 Industrial Furnace (EPN 104) until the VOC concentration is less than 400 ppmv. If the Industrial Furnace (EPN 104) is not available, then these emissions must be routed to the vapor combustor, EPN 120. The vapor combustor must achieve 98 percent control efficiency for VOC and the industrial furnace must achieve 99.9999 percent control efficiency for VOC. Any wastewater will be pumped into another hazardous waste storage tank and will be burned in the industrial furnace in Regeneration Unit No. 2 (EPN 104). The outlet VOC concentration from the tanks after final nitrogen purge shall be below 20 ppmv. The purge rate of the blower shall not exceed 500 CFM at ambient temperature:

- D. Catalyst converter planned MSS activity is limited to 218 hours per rolling twelve months from EPN CATSCNR2. Planned MSS generated particulate emissions shall be directed to a bag filter. Outlet bag filter grain loading shall be limited to a maximum of 0.01 grains per dry standard cubic foot. (x/12)
- E. Only these planned MSS activities described in this condition are authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the maintenance, start-up, and shutdown (MAERT). The performance of each planned maintenance activity and emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis. These records shall include at least the following information: (x/12)
  - (1) the physical location at which emissions from the planned MSS activity occurred, including the emission point number, common name, and any other identifier for the point at which the emissions were released into the atmosphere;
  - (2) the type of planned MSS activity and the reason for the planned activity;
  - the common name and the facility identification number of the facilities at which the planned MSS activity and emissions occurred;
  - (4) the date and time of the planned MSS activity and its duration;

(5) the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the amendment application, PI-1 dated December 15, 2006, December 17, 2007 and May 31, 2011, consistent with good engineering practice.

#### Process Fugitive Monitoring Programs

- 9. 28PI Piping, Valves, Pumps and Compressors in Spent H<sub>2</sub>SO<sub>4</sub> and SO<sub>2</sub> Service (2/07)
  - A. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute,

    American Petroleum Institute, American Society of Mechanical Engineers, or equivalent codes.
  - B. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
  - C. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Non-accessible valves, as defined in 30 TAC Chapter 115, shall be identified in a list to be made available upon request.
  - D. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. Except during sampling, the second valve shall be closed.
  - E. All piping components shall be inspected by visual, audible, and/or olfactory means at least once a week by operating personnel walk-through.
  - F. Damaged or leaking valves, connectors, compressor seals, and pump seals found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair a leaking component as specified in this paragraph within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot

be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.

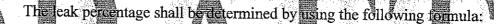
G. Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the TCEQ upon request.

<u>Piping, Valves, Connectors, Pumps and Compressors in VOC Service for Hazardous Waste</u> <u>Operations</u>

- The permittee shall comply with these requirements for all equipment items, except relief valves, which contact hazardous or specified non-hazardous wastes or vapors from these wastes:
  - A. All valves and piping shall be above ground and so located as to be reasonably accessible for leak checking during plant operation.
  - B. Piping connections shall be welded or flanged. Flanges and flange gaskets shall be of the design and quality that the potential for fugitive losses is minimized.
  - C. All pumps shall be sealless or equipped with double mechanical seals using an oil or water based barrier fluid which operates at a pressure higher than the process pressure.
  - D. All valves shall be designed, constructed, and tested by the manufacturer for leak-free performance.
  - E. New and reworked valves installed as replacements shall be tested prior to operation by hydrostatic or gas testing in-place or by an appropriate bench test to determine that the valves do not leak.
  - F. Prior to the initial burning of hazardous waste and annually thereafter, all pumps, valves, and flanges shall be hydrotested or gas-tested at 100 percent or more the maximum operating pressure and adjustments made as necessary to obtain bubble-tight, leak-free performance.

- G. All pumps, valves, and flanges shall be monitored monthly with a hydrocarbon gas analyzer. Monitored values which are greater than 25 parts per million (ppm) above any background concentration when measured at a distance of less than three inches shall be considered evidence of a leak.
  - (1) In lieu of the monthly monitoring frequency specified in Special Condition No. 9G, pumps, valves, and flanges may be monitored on a quarterly basis if the leak percentages of these components for three consecutive monthly monitoring periods is less than 0.2 percent.

If the leak percentage for any quarterly monitoring period is 0.2 percent or greater, the facility shall revert to monthly monitoring for pumps, valves, and flanges until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph



$$(CI_1 + Cs_1) \times 100/Ct_1 = Cp_1$$

Where:

- Cl<sub>1</sub> the number of pumps, valves, and flanges found leaking by the end of the monitoring period.
- Cs<sub>1</sub> = the number of pumps, valves, and flanges for which repair has been delayed and are listed on the facility shutdown log.
- Ct<sub>1</sub> = the total number of pumps, valves, and flanges in the facility subject to the monitoring requirements, as of the last day of the monitoring period.
- Cp<sub>1</sub> = the percentage of leaking pumps, valves, and flanges for the monitoring period.
- H. All agitator seals shall be monitored monthly with a hydrocarbon gas analyzer. Monitored values which are greater than 25 ppm above any background concentration when measured at a distance of less than three inches shall be considered evidence of a leak.

(1) In lieu of the monthly monitoring frequency specified Special Condition No. 9H agitator seals may be monitored on a quarterly basis if the leak percentages of these components for three consecutive monthly monitoring periods is less than 0.2 percent.

If the leak percentage for any quarterly monitoring period is 0.2 percent or greater, the facility shall revert to monthly monitoring for agitator seals until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

(2) The leak percentage used in paragraph H(1) shall be determined using the following formula:

# $(Cl_2 + Cs_2) \times 100/Ct_2 = Cp_2$ Where: $Cl_2 = \text{the number of agitator seals found leaking by the end of the monitoring period}$ $Cs_2 = \text{the number of agitator seals for which repair has been delayed and are listed on the facility shutdown log}$

- Ct<sub>2</sub> = the total number of agitator seals in the facility subject to the monitoring requirements, as of the last day of the monitoring period.
- $Cp_2$  = the percentage of agitator seals for the monitoring period.
- I. All agitator seals, pumps, valves, and flanges shall be inspected on a daily basis and shall be monitored if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. Monitored values which are greater than 25 ppm above any three inches shall be considered evidence of a leak. Visible presence of the leaking waste liquid shall always constitute a leak and, therefore, will not necessitate the use of a monitor for detection purposes.
- J. Two continuous ambient hydrocarbon monitors shall be installed, maintained and operated around the perimeter of each of the storage modules for the purpose of identifying fugitive leaks. Each monitor shall alarm at: (4/07)

- (1) Calculated hourly averages above 25 ppm; or
- (2) An instantaneous value above 25 ppm; and
- (3) An alarm shall result in both an immediate search for leaking equipment by personnel using portable monitors and a written record of the conclusion of that search.

If the hourly average remains above 25 ppm and the initial search was negative, additional searches need not be conducted except on 24-hour intervals.

Alternate, equivalent methods or additions to these required methods for identifying fugitive leaks may be approved by the Executive Director of the TCEQ upon written request by the permittee.

Hand held monitors meeting Method 21 monitoring requirements can be used to monitor for process fugitive leaks during periods when the hydrocarbon monitors are out of service.

- K. Leaking equipment shall be repaired or isolated within four hours after detection, except for valves connected directly to tanks, which are allowed four hours after the affected tank has been emptied and decontaminated. Emptying and decontamination of the affected tank shall be initiated immediately after the detection of a leak. Equipment shall not be returned to service until the leak is repaired.
- L. The repair and maintenance of any equipment component shall be assisted by use of a hydrocarbon gas analyzer such that a minimum concentration of leaking hydrocarbons is achieved and that the resulting concentration is less than 25 ppm above any background concentration when measured at a distance of less than three inches. An acceptable alternative of demonstrating VOC to be less than 25 ppm is to pressure test with nitrogen up to 125 pounds per square inch. If there is no drop in pressure over a 15 minute period, the equivalent 25 ppm threshold is satisfied.
- M. The holder of this permit shall operate and maintain all portable hydrocarbon gas analyzers to meet the performance specifications, field tests, and calibrations as found in 40 CFR § 264.1063. Alternate, equivalent equipment items, operating modes, and maintenance activities may be approved by the Executive Director of the TCEQ upon written request by the permittee.
- N. Records of monitoring and maintenance actions, required by the Special Condition No. 9 of this permit shall be maintained for a period of three years,

shall be made available to authorized state and local air pollution control agencies, and shall include, at a minimum, the following data:

- (1) A list of all components affected by this special condition;
- (2) Checklists indicating the daily inspections are being performed;
- (3) Checklists indicating the monthly inspections are being performed;
- (4) Checklists indicating the annual inspections are being performed;
- (5) Checklists indicating the continuous ambient monitors are being operated and maintained;
- (6) Summaries including the date, time, equipment identification, and monitoring results for all leaking items;
- (7) Summaries including the date, time, equipment identification, and corrective actions for all isolations, replacements and/or repairs performed, including monitoring results immediately after repairs; and
- (8) Records of the calibration of the portable and continuous monitoring instruments.

(Note: Checklist and summaries may be computerized but shall be verified by signed writing confirming that the required checks were completed.)

#### Vapor Combustor

- 11. A. Vents from Fixed-Roof Storage Tanks designated as B1, B2, F2, F3, H1, H2 and Tank 554 and hazardous waste truck and railear depressurizations shall vent to the Regeneration No. 2 Furnace designated as EPN 104 when it operates and these tank vents and depressurizations shall be directed to the Vapor Combustor designated as EPN 120 up to 1,314 hours per rolling 12 months when EPN 104 is not operable. (12/08)
  - B. The MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) from Tanks F2, F3, and T554 and the MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) for the equivalent size Tanks B1 or B2 and MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) for the equivalent size Tanks H1 or H2 shall vent to the Regeneration Unit No. 2 Furnace designated as EPN 104 when it operates and shall be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is not operable. These tank MSS activities are limited to 840 hours per rolling 12 months. (12/08)

12. Vents from Tanks 48, 49, 53 and 56 and spent tank truck depressurizations shall be vented to the Regeneration No. 2 Furnace designated as EPN 104 when it operates and these tank vents and depressurizations shall be directed to the Vapor Combustor designated as EPN 170 up to 1,314 hours per rolling 12-months when EPN 104 is not operable. A maximum of four tank trucks can be depressurized in one hour to the represented emission controls. (4/07)

Storage Tank Vent 78 and spent railcar depressurizations shall vent to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the caustic scrubber and then routed to the Vapor Combustor designated as EPN 170 when the No. 2 Regeneration Furnace is down up to 1,314 hours per calendar year. The caustic scrubber outlet vent shall be directed to the inlet of EPN 170. (3/06)

13. Each Vapor Combustor designated EPNs 120 170 and the portable vapor combustor designated as EPN TKINSP/MSS2 shall be equipped with a continuously burning pilot system or other automatic agnition system that assures combustor ignition and that provides immediate notification of appropriate supervisory personnel when the ignition system ceases to function properly. (4/07)

#### Initial Determination of Compliance

- 14. Sampling ports and platform(s) shall be incorporated into the design of the Vapor Combustor Stack designated as EPN 170 and Regeneration Unit No. 2 Stack designated as EPN 104 according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Director. (x/12)
- 15. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Vapor Combustor (EPN 170) and Regeneration Unit No. 2 Stack (EPN 104). The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. (x/12) (PSD)
  - A. The appropriate TCEQ Regional Office in the region where the source is located shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting,
- (2) Date sampling will occur,
- (3) Name of firm conducting sampling,
- (4) Type of sampling equipment to be used, and
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures. Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standards testing, which must have the EPA approval, shall be submitted to the TCEQ Regional Director.

B. Air contaminants emitted from the Vapor Combustor (EPN 170) to be tested for include (but are not limited to) VOC.

Air contaminants emitted from the Regeneration Unit No. 2 Stack (EPN 104) to be tested for include (but are not limited to) CO, H<sub>2</sub>SO<sub>4</sub> mist, NO<sub>x</sub>, PM and SO<sub>2</sub>. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1 and 3. Stack testing of EPN 104 shall be completed between 90 days and 180 days after installation of the emission abatement equipment required by Special Condition No. 3. (x/12) (PSD)

C. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires the EPA approval, and requests shall be submitted to the TCEQ Regional Director.

D. The plant shall operate at maximum production (or loading) rates during stack emission testing. The stack test will be conducted under the combination of the maximum conditions as identified in the MAERT as Vapor Combustor 2-Normal plus Vapor Combustor 2-Standby (maintenance). Primary operating parameters that enable determination of production rate (or loading rate) and combustor operating parameters shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting. If the plant is unable to operate at maximum rates during testing, then future production (or loading) rates may be limited to the rates established during testing. Additional stack testing may be required when higher production rates are achieved. The combustor operating parameters during testing shall be used to set the normal operating conditions until the next stack test is performed.

The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permittee) for the H<sub>2</sub>SO<sub>4</sub> Regeneration Unit No. 2 at the time of testing for EPN 104. This H<sub>2</sub>SO<sub>4</sub> production rate shall be monitored and recorded during the stack test of EPN 104. If the normal production rate of H<sub>2</sub>SO<sub>4</sub> from the Regeneration Unit No. 2 exceeds by more than 10 percent the tons per day maintained during sampling of EPN 104, the permit holder must notify, in writing, the appropriate TCEQ Regional Office, and the source may be subject to additional sampling to demonstrate continued compliance. (x/12) (PSD)

E. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. One copy of the final sampling report shall be distributed as follows within 60 days after sampling is completed. (x/12) (PSD)

The appropriate TCEQ Regional Office; each applicable local air pollution control program, and EPA Region 6 New Source Review in Dallas (EPN 104 only)

F. A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or EPA sampling procedures and any written contact as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting shall be sent to each applicable local air pollution control program with jurisdiction in conjunction with paragraph A of this special condition. Requests for additional time to perform sampling in conjunction with paragraph C of this special condition shall be sent to each applicable local air pollution control program with jurisdiction.

#### Continuous Demonstration of Compliance

- The industrial furnace shall not emit non-sulfate particulate matter in excess of 0.02 grain per dry standard cubic feet when corrected for the amount of oxygen in the stack gas in accordance with the formula specified in 40 CFR § 264.343(c). Corrections for the amount of sulfate particulate in the stack gas shall conform to the procedures specified in the TCEQ Laboratory Methods Manual.
- 17. The following requirements apply to capture systems for EPN 104 emitting  $SO_2$ . (x/12)
  - A. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system;
  - B. The control device shall not have a bypass.
  - C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.
- 18. The minimum liquid flow to the absorber (EPN 104) shall be 200 gallons per minute (gpm). The circulation rate shall be monitored and recorded at least once a day. (x/12) (PSD)

The liquid flow rate shall be recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

The minimum pH on the second stage of the scrubber's scrubbing solution downstream of the Brinks mist filter is 5.0. This pH shall be analyzed and recorded at least once a day.

Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within 0.5 pH unit.

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Quality-assured (or valid) data must be generated when the facility generating emissions are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the facility generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

- 19. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO<sub>2</sub> and the total gas flow rate from the Regeneration Unit No. 2 Stack (EPN 104) on and after April 1, 2014. (x/12) (PSD)
  - A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ±5 percent from the tagged cylinder gas value.
  - B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO<sub>2</sub> per hour at least once every month.
  - C. All monitoring data and quality assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ personnel, EPA personnel or any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO<sub>2</sub> emission limits specified in MAFRT.
  - D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace, but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments. (x/12)

nakan dari bergi dan atau agam di kasal dan perbagai di dan di kasal dan di kasalan gengeri dan. Dari dan mengguni kasalan dan bergian dan kasal dan mengguni dan di pengguni bergi bergi bergi bergi bergi kas Dan dan bergi dan mengguni bergian dan dan dan bergian dan mengguni bergian dan dan mengguni bergi bergian ber

## SPECIAL CONDITIONS Permit Number 4802/PSDTX1260 Page 19

- E. The CEMS shall be used to demonstrate compliance with the SO<sub>2</sub> emission limits as found in Special Condition No. 3. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the Alternate Monitoring Plan (Attachment A). (x/12)
  - (1) The SO<sub>2</sub> CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO<sub>2</sub> emission rate in units of pounds per ton of one hundred percent acid produced.
  - (2) The SO<sub>2</sub> CEMS shall monitor and record the SO<sub>2</sub> emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
  - (3) Implementation of the monitoring requirements has been defined in the Alternate Monitoring Plan (AMP) for the SO<sub>2</sub> CEMS system.
  - (4) The AMP supersedes the corresponding SO<sub>2</sub> monitoring requirements of NSPS Subpart H.
  - (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
  - (6) In the event of CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 3 according to the procedures specified in the AMP.

Dated: month day, 2012

## Attachment A Alternative Monitoring Plan for SO<sub>2</sub> Emissions Rhodia Inc. Houston, TX Unit 2 Single Absorption Sulfuric Acid Regeneration Plant with Scrubber

## Justification for Using an Alternative Monitoring Plan (AMP) for SO<sub>2</sub> emissions

The regulations that established the NSPS for sulfuric acid plants are over 30 years old. At the time, the regulatory standard was established as 4 lb of SO<sub>2</sub> emissions per ton of 100 % sulfuric acid produced, and compliance with the standard was to be demonstrated using a calculation similar to Equation 1 below. Regulations required the use of a CEMS to measure SO<sub>2</sub> concentration at the stack (M2), but only required measurement of SO<sub>2</sub> entering the converter by suitable method three times per calendar day. Plants typically rely on the use of a Reich test once per shift to establish the SO<sub>2</sub> concentration entering the converter (M1). While the stack measurement represented a nearly continuous real time indication of the stack concentration, performing a Reich test once per shift for the converter inlet concentration provides little more than a random sample once every eight hours.

The methodology proposed in this AMP will provide a more continuous real-time indication of compliance by using a process analyzer to measure the converter inlet SO<sub>2</sub> concentration. While this analyzer will be nearly identical to the CEMS that is commonly used at the stack, it will not be able to meet all of the standards that are usually applied to a CEMS because of the process conditions and / or physical limitations of an existing facility. For example, it is not feasible to modify the existing ductwork around the analyzer to meet the normal guidelines for straight runs of pipe upstream / downstream of the analyzer. We believe that the disadvantages (places where the analyzer is not quite up to CEMS standards) are far outweighed by the advantages of using a real time instrument, rather than a periodic Reich test, to measure the converter inlet concentration. Rhodia will use best professional judgment to ensure the analyzer located at the converter inlet provides representative data.

Except as noted in this document, the objective of this proposed AMP is to maintain the process analyzer at the converter inlet in a manner that is similar to the stack CEMS, as set forth in 40 CFR Part 60, Appendix B and F.

#### **Definitions**

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned.

"Long-Term Limit" shall mean a sulfur dioxide (SO<sub>2</sub>) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor maintenance or careless operation.

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

"Short-Term Limit" shall mean the SO<sub>2</sub> emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times.

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases.

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

## Part 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO<sub>2</sub> analyzers at the converter inlet and exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.

## Equation 1

 $Xe = (M1 - M2)/(M1 - 1.5 \times M1 \times M2)$  E = (K / Xe) - KWhere:

Xe = fractional conversion efficiency

M1 = fractional concentration of  $SO_2$  entering the converter

M2 = fractional concentration of  $SO_2$  at the stack

 $E = SO_2$  emission rate in lb / ton of 100 % acid produced

 $K = 1306 = (2000 \text{ lb / ton}) \times (64 \text{ lb / lbmol SO2})/(98 \text{ lb / lbmol } H_2SO_4)$ 

#### **Short-Term Limit**

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for SO<sub>2</sub>.

At any given time the system will maintain an array consisting of the 36 most recent samples of the SO, concentrations at the converter inlet and at the exit stack.

Once every five minutes, the system will sample the latest SO<sub>2</sub> concentrations, and the recent readings to the array and delete the oldest readings. If the unit is not operating then the array of data will not change.

 $M1_{3hravg}$  will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of  $SO_2$  entering the converter ( $M1_{3hravg}$ ).  $M2_{3hravg}$  will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of  $SO_2$  at the stack ( $M2_{3hravg}$ ).

The rolling 3 hour average SO<sub>2</sub> emissions (E<sub>3hravg</sub>) will then be calculated per Equation 2.

 $\frac{\text{Equation 2}}{\text{Xe}_{3\text{hravg}}} = \frac{\text{(rolling 3 hour average SO}_2 \text{ emissions)}}{\text{Ke}_{3\text{hravg}}} = \frac{\text{(M1}_{3\text{hravg}} - \text{M2}_{3\text{hravg}})}{\text{(M1}_{3\text{hravg}} - 1.5 \text{ x M1}_{3\text{hravg}} \text{ x M2}_{3\text{hravg}})}{\text{E}_{3\text{hravg}}} = \frac{\text{(K / Xe}_{3\text{hravg}}) - \text{K}}{\text{Ke}_{3\text{hravg}}}$ 

The production unit will be deemed to be operating in compliance with the Short Term Limit if E<sub>3hr-avg</sub> does not exceed 3.0 lb of SO<sub>2</sub> per ton of 100% sulfuric acid produced during all Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the SO<sub>2</sub> monitors, the SO<sub>2</sub> measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

## Long-Term Limit

The following method will be used to calculate the daily average lb of  $SO_2$  per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the SO<sub>2</sub> concentrations (converter inlet and exit stack) will be sampled and this time will be counted as five operating minutes. If the unit is not operating, then the SO<sub>2</sub> concentrations will not be sampled.
- The daily average will be calculated as follows for each calendar day:

o M1<sub>daily avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of SO<sub>2</sub> entering the converter.

M2<sub>daily avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of SO<sub>2</sub> at the stack

o E<sub>(daily avg)</sub> will then be calculated using Equation 3.

Equation 3 (daily average SO<sub>2</sub> emissions

 $\overline{Xe_{\text{daily avg}} = (Ml_{\text{daily avg}} - M2_{\text{daily avg}})/(Ml_{\text{daily avg}} - 1.5 \times M1_{\text{daily avg}} \times M2_{\text{daily avg}})}$ 

Edaily avg = (K / Xedaily avg) - K

The number of operating minutes for the day will be summed ( $T_{day}$ ,)  $E_{dayavg}$  and  $T_{day}$  will be used to calculate a 365-day rolling average of lb/ton. The daily averages will be weighted by the number of operating minutes per day, as

per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO<sub>2</sub> emission rate will be calculated using Equation 4.

## Equation 4

$$E_{365avg} = \frac{\sum [E_{dayavg} * T_{day}]}{\sum T_{day}}$$

The production unit will be deemed to be operating in compliance with the Long-Term Limit if  $E_{365avg}$  does not exceed 1.8 lb of  $SO_2$  per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the SO<sub>2</sub> monitors, the SO<sub>2</sub> measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunction, breakdowns, and repairs:

## Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack and Converter Inlet Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup. Specifications for the analyzer located at the converter inlet are based on Rhodia's experience with process analyzers at these locations.

An equivalent an	alyzer may	be substituted for	any reason. 📉	
Location	M	anufacturer	Model Number	Range
Stack	Amet	ek-Photometric	<b>√</b> 920	Dual range
		Analyzer	(or equivalent)	Dual range: Normal: 0 – 500 ppm SO <sub>2</sub> SSM: 0 – 3,600 ppm
	/ (o)	r equivalent) 📗 🌡		SSM: $0-3,600 \text{ ppm}$
4	/			$SO_2$
_/Converter_/	Amet	ek Photometric	920 of IPS-4	Single range: 0 15 % SO <sub>2</sub>
Inlet	RECEIVED.	Analyzer	(or equivalent)	
11 19 10 1 1 Ex	(OI	equivalent)		1 3 2 2 3 2 3 3 3 3 3 3 3

## Pt. 60, App. B, Spec. 2, Section 1.0 (Stack and Converter Inlet Analyzers)

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Initial compliance certification required only if the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

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## Pt. 60, App. B, Spec. 2, Section 8.0 (Converter Inlet Analyzer)

Rhodia will select the optimum location to obtain representative SO<sub>2</sub> readings from this location. Turbulence near the blower exit and elevated temperature at the converter inlet may require an analyzer measurement location that differs from the requirements of this section (e.g. pollutant stratification). A pollutant stratification test is not warranted for this application because (a) process conditions make it extremely unlikely that stratification could occur, and (b) the samples obtained under this monitoring plan are the same as would be obtained under the NSPS, except

that the instrument will typically take 288 samples per day rather than the 3 required by the NSPS. Therefore, no new stratification risk is introduced by this method, but the instrument will typically take about 100 times as many samples.

## Pt. 60, App. B, Spec. 2, Section 16.0 (Converter Inlet Analyzer)

Rhodia will use the Alternative Relative Accuracy Procedure provided in Section 16.2.1 (i.e. conduct a cylinder gas audit).

## Pt. 60, App. F, Spec. 2, Section 5.0 (Converter Inlet Analyzer)

Rhodia will use quarterly cylinder gas audits (i.e. four per year) to satisfy the requirements of this section.

## System Maintenance and Malfunction

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required-zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above

## In the event of a CEMS malfunction of greater than 24 hours:

- Exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Reich test or other method (e.g. portable analyzer).
- Converter inlet gas will either be sampled, or estimated using engineering judgment, at least once every four hours during all Operating Hours.
- Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exceptions. If the stack CEMS is out of service, the most recent hourly reading will be substituted for the 12 five-minute readings that would otherwise be taken if the system was operating normally. Similarly, if the converter inlet SO<sub>2</sub> analyzer is out of service, the most recent four-hour reading will be substituted for the 48 five-minute readings that would otherwise be taken if the system was operating normally.

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

## **System Modifications**

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

## **Alternative Monitoring System**

The monitoring system proposed in this Alternative Monitoring Plan is expected to be a significant improvement over the monitoring requirements contained in the NSPS for sulfuric acid plants. However, the real-time calculation of  $SO_2$  emissions is dependent upon the use of an  $SO_2$  analyzer in the inlet duct to the converter, and the maintenance of that analyzer to approximately the same performance standards normally applied to the stack  $SO_2$  CEMS. This is an unproven application of this technology, and there is some risk that the converter inlet  $SO_2$ 

analyzer will not be able to perform as required despite the best efforts of Rhodia and the instrument manufacturer.

If Rhodia and the instrument manufacturer are unable to make the system operate to the indicated standards because the converter inlet SO<sub>2</sub> analyzer is unreliable and / or inaccurate in this application, then Rhodia will promptly notify EPA Region 6, and TCEQ of its determination and proceed as follows:

- Rhodia will immediately begin meeting its SO<sub>2</sub> emissions monitoring requirements in accordance with 40 CFR Part 60, Subpart H, except that the SO<sub>2</sub> concentration at the converter inlet will be analyzed six times per day rather than the three times per day specified in the regulations.
- Rhodia will provide whatever information is requested by EPA regarding the determination that the converter inlet SO<sub>2</sub> analyzer can not meet the necessary performance standards.
- Rhodia will work with EPA to determine whether real time measurement of SO<sub>2</sub> emissions (in lbs / ton of acid) can be readily accomplished through other means without the use of an SO<sub>2</sub> analyzer at the converter inlet.

Dated month day, 2012

#### APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

#### Permit Number 4802/PSDTX1260

Acetaldehyde Acetic Acid Acetic Anyhdride

Acetone

Acetone Cyanohydrin

Acetonitrile Acetophenone

2-acetylaminofluorene

Acetyl Chloride Acetylsalicylic acid Neo Acid Anhydrides

Acrolein\*

Acrylamide (solid)
Acrylonitrile\*

Acrylic Acid
Adipic acid

Adiponitrile.

Aldrin Alicarb

Aliphatic Carboxylic Acid

Aliphatic Hydrocarbons

Alkenyl Caroxylate

Allyl Alcohol

Alpha Methylstyrene

Alpha Naphtylamine

Alpha Naphthylthiourea

2-(2-Aminoethoxy)Ethanol

4-aminophenol

Aminoethyl Ethanolamine

tris(hydroxymethyl)aminomethane

Amitrole (solid)
Ammonia

Ammonium Hydroxide Ammonium Nitrate\* Ammonium Polysulfide Ammonium Procrate, dry t-Amyl Hydroperoxide

Aniline\*
Anthracene\*
Anthroquinone
Antimony\*

Aromatic Naphtha

Arsenic\*
Arsine\*

Ash Atrazine\* Auramine

Barium\*

Azeo Oil

Barium Sulfate Bendocarb

Benz(a)anthracene Benz(a)pyrene\* Benz(c)acrindine Benzaldehyde

Benzamide, 3,5-dichloro-N-(1,1-dimethyl-2-propynyl)

Benzyl mercaptan

Benzene\*

Benzene, 1,1-(2,2-dichloroethylidene) bis

[4-chloro-]

Benzenediamine

Benzeneethanamine, alpha, alpha-dimethyl-

Benzene Hexchloride

Benzene Sulfonyl Chloride

Benzidine (solid)

Benzonitrile

Benzo (RST) pentaphene

Benzo (a) pyrene

Benzo (a) phenanthrene Benzotriazobenzotrialzole

Benzoic Acid p-Benzoquinone\*

2-(2-hydroxy-3,5 di-(tert)amylphenol)

benzotirazoloe Benzotrichloride Benzoyl Chloride Benzyl Chloride\*

Beryllium Biodiesel Biphenyl\* Bipyridyl

Bis(2-chloroethoxy)methane Bishexamethylenediamine Bis(methylthio)methane

Boron

Bromoacetone, liquid

## APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

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Bromoform (tribromomethane)

Bromomethane (methyl bromide)

Brucine (solid)

Butadiene polymer

Butadiene tar

n-Butyl Acetate

Butyraldehyde\*

Butyl Ether

n-Butyl Formate

n-Butyl Propionate

1,3 Butadiene

n-Butane

1,4 Butanediol

Butanol

2-Butanol

n-butanol

t-butanol

1-Butene

cis-3 Butene

2-methyl-1-butene

n-butyl acetate

Butyl Acrylate

sec-butyl alcohol

Butylcellosolve

t-Butyl Hydroperoxide\*

n-Butylmercaptan

1,3-Butylene Glycol

2-butyne-1,4-diol (BYD)

1,4-butynediol

Butyric Acid\*

2-methyl butyric acid

C-4

Cacodylic Acid

Camphechlor

Carbaryl (solid)

Carbon Bisulfide

Carbon Disulfide\*

Carbon Tetrachloride

Castor Oil

Catechol

Chloral, anhydrous, inhibited

Chlordane

Chlorinated Polyisobutylene

Chloroacetaldehyde

Chloroaniline-p

Chlorobenzene

1,2,4,5-tetrachlorobenzene

Chlorobenzilate

1-Chlorobutane

2-chloroethyl vinyl ether

Chloroform

Bis (2-chloro-1-methylethyl) ether

Chloromethane

(Chloromethyl) ether, bis

Chlormethyl methyl ether

Chloronaphazine

2-chloronaphthalene

o-Chlorophenol

2.6-dichlorophenol

Chromium\*

Chrysene\*

Coal tar

Creosote Cresol

-m-cresol

4-chloro-m-cresol

p-cresol

Crotonaldehyde

Cumene Hydroperoxide

di-tert-butyl-para-Cresol

Cumene

Cumene Hydroperoxide

p-Cumyl Phenol

Cyanogen Bromide

Cyanogen Chloride with less than 0.9% water

Cyanogen Gas

1,3,6-tricyanohexane

Cyclohexane

Cyclohexanone

Cyclooctadiene

Cyclophosphamide

Copper\*

Creosote\*

Crotonaldehyde\*

Cyclohexyl Amine\*

#### APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS Permit Number 4802/PSDTX1260

Page 3

Cyclopentadiene -

Daunomycin

DDT

Diacetone Alcohol Dialkyl Disulfide Oil

Dibenz (A,H) anthreacene

Dibromomethane

Dibromomethane-1,2

Dibutylphthalate

Dicamba

o-Dichlorobenzene

m-Dichlorobenzene

p-Dichlorobenzene (solid)

Dichlorobenzidine-3,3 (solid)

Dichlorobutene

Dichloro-1,4, butene-2

1,2-Dichloroethane

trans-1,2-dichloroethene

Dichloroethyl ether

Dichlorodiflouromethane

Dichloromethane

Dichlorophenol-24

2,4 Dichlorophenexy Acetic Acid

Dichloropropylene-1,3

Dicyanoethylamine

Dicyclopentadiene

Dieldrin

Diepoxybutane

Diethanolamine

Diethylaminoacetone

Diethyl Sulfide

Diesel Fuel

Di(2-ethylhexyl)phthalate

Diethylarsine

Diethyl Ether

Diethyl Ketone

Diethyl Phthalate

Diethylstilbestrol

Diethylene Glycol

Diethylene Glycol Dimethyl Ether

Diethylene Glycol Monomethyl Ethers are all Dipropylamine

Diethylenetriamine

Diglyme

2,3 dihydrofuran

Dihydrosafrole

Diisobutylene

Dimethoate

Dimethoxybenzidine-3,3

Dimethylamine

p-dimethylaminoazobenzene

Dimethylaminoethoxyethanol

Dimethylbenz(a)-anthracene-7,12

Dimethylbenzene

Dimethylbenzidine-3,3

(1,3-dimethylbutyl)-N-phenyl

Dimethylcarbamyl Chloride

Dimethyl Disulfide

Dimethylethanolamine\*

Dimethylformamide

Dimethylhydrazine unsymmetrical

Dimethylmethylaminoethoxy ethaneamine

Dimethylphenol -2.4

(1,4-dimethylphentyl)-N-phenyl

Dimethyl Phthalate

Dimethyl Siloxane

Dimethyl Sulfate

Dimethyl Sulfide

Dimethyl-Sulfoxide

Dimethyl Disulfide\*

Dimethyl Formamide (DMF)

1,2 Dimethyoxybenzene

Dimethoxyethane

Dimethyl Ether

Dimethylaminopropylamine DMAPA

Dimorphoxy Amino Glycol

4.6 Dinitro-o-cresol\*

Dinitrocyclohexylphenol

Dinitrotoluene-2,4

Di-n-octyl Phthalate

Dinoseb

Di-N-Propylamine

Dioxane

Diphenyl Hydrazine-1,2

Dipropylene Glycol Methyl Ether

Contest the History A

## APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

Permit Number 4802/PSDTX1260

Page 4

Disulfoton

Di-t-butyl Peroxide

Dithiobiunet

Dithiobiuret

Diruon

Dodecane

Dodecybenzene

Dodecybenzene alkylates

Dodecyl Mercaptan\*

tert-dodecylmercaptan

Endosulfan

Endrin

Epichlorohydrin\*

Epinephrine

1,2 ethanedithiol

Ethane, 1, 1, 1, 2-tetrachloro

Ethanimidothioic acid, N-

[(methylamino)carbonyl[oxy]-methy ester]

Ethanol

n-nitrosodiethanolamine

Ethoxy Ethanol

Ethoxy Triglycol

Ethyl Acetate

Ethyl acrylate

n-nitrosodiethylamine

Ethylbenzene

Ethyl Carbamate

Ethyl Lactate

Ethyl Mercaptan

Ethyl Methacrylate

Ethyl Methanesulfonate

Ethyl Methyl Ketone

Ethyl Parathion (solid)

Ethyl trimethyoxysilane

Ethylene

Ethylene Bromide

Ethylene Dichloride

Ethylene Imine, inhibited

Ethylene Oxide\*

Ethylene Thiourea (solid)

Ethylidene Dichloride

2-Ethylhexaldehyde

Ethyl Lactate

Ethylene Almine, inhibited

Ethylene Diamine

Ethylene Glycol

Ethylene Oxide

2 Ethyl-1-Hexanol

2-Ethylhexanoic Acid

Ethyl mercaptan\*

Ethylidene norbornene

Ethyl Propyl Acrolein

Ethylsuccinonitrile

Etoposide

Facet 75 DF Herbicide

Famphur

Fatty Acids

Fludioxonil

Flumaric Acid

Fluoroacetamide

Fluoranthene

Fluorosulfonic Acid

Fluorotrichloromethane

Fluorthene

Formaldehyde\*

Formic Acid

No. 2 Fuel Oil

Furan

Furfural\*

Gasoline

Gasoline Jet Fuel

Glutaric acid

2-methylglutaronitrile

Glycidaldehyde

Glycol Acetate

Glycol Diacetate

Grease

Guaiacol

Guanidine, N-methyl-N'-nitro-N-nitroso-

HBM (2-hydroxisobutyric acid methyl ester)

Heptachlor (solid)

Heptane

Heptanol

## APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS Permit Number 4802/PSDTX1260 Page 5

3-Heptanone

Hexachlorobenzene

Hexachloro-1,3-butadiene\*

Hexachloroethane

Hexachlorocyclopentadiene

Hexachlorophene

Hexachloroprene (solid)

Hexane

1,6 hexamethylene diisocyanate\*

Hexamethylene-1,6-diisocyanate

Hexene

Hydraulic Oil\*

Hydrazine

Hydrazine, 1,2-diethyl-

1,2-dimethylhydrazine

Hydrazine Hydrate

Hydrochloric Acid, liquid

Hydrocyanic Acid, liquefied

Hydrogen Chloride\*

Hydrogen Cyanide

Hydrogen Silesquioxane

Hydrogen Sulfide

Hydroquinone

Hydroquinone Methyl Ether

2-hydroxyisobinyric acid methyl ether

(HBM)

Hydroxylamine

Indene\*

Indeno (1,2,3-CD) Pyrene

Iron Sulfate

Isobutanol

Isobutyl Acetate

Isobutyraldehyde

Isodecyl Alcohol

-

Isooctane

Isodrin

Isopar E

Isopar L

Isopentane

Isoprene

Isopropanol

Isopropyl Acetate

Isopropyl Formate

Isopropyl Mercaptan

Isosafrole

Isozaflutole

Kerosene

Ketone

Keto/enol

Lasiocarpine

Lead Acetate

Lindane\*

Lube Oils

Magnesium Chloride

Malathion

Maleic Anhydride\*

Malononitile

Manganese\*

Metenoxam

Melphalan

Mercury

Methacrylonitrile

Methanethiol\*

Methapyrilene

Methonivi Intermediate (MHTA)

Methoxychlor (solid)

Methoxydihydropyran, liquid

n-(2-Methoxy-;-Methylethyl)-2,4-dimethyl-

2-amino-1-methoxypropane

n-methylacetamide

Methyl-3-13-(2H-benzotrizole-2-YL)-5-(tert)-

butyl-4 hydroxy phenyl) propionate

Methyl Chloride

Methyl Chlorocarbonate

Methyl Chloroform

Methyl Cyclohexane

Methyl Ethyl Ketone Peroxide

Methyl Glutanoitrile

2-Methylglutanronitrile

1-Methyoxy-2 Propanol

2-Methyoxy-1 Propanol

Methyl Acetate

Methyl Acrylate\*

## APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

Permit Number 4802/PSDTX1260

Page 6

Methyl Alcohol

3-methylchlolanthrene

Methyl Chlorocarbonate

Methylcholanthrene-3

n,n-bis-methylethyl

Methyl Ethyl Ketone

Methyl Ethyl Morpholine

Methyl Formate

3-methylhexane

Methyl Hydrazine

Methyl Iodide

Methyl Isobutyl Ketone

Methyl Isocyanate

1-Methyl-2-Pyrrolidinone NMP

Methyl Mercaptan

Methylmercaptopropionaldehyde

Methyl Methacrylate

n-methyl morpholine

Methylnapthalene\*

Methyl Parathion

4-methyl-2-pentanone

2-(3.5-bis(methylphenylethyl)-2

hydroxyphenyl

Methyl Propyl Ketone

n-methyl pyrillidone

Methyl Tert-Butyl Ether

tetramethylthiuram disulfide

n-nitroso-n-methylurethane

Methylal

Methylthiouracil

Methylcyclohexanol

Methylene-bis-orthochloroaniline

Methylene Chloride

Methylpyridine-2

Methyl vinyl bis

(N-methylacetamindes) silane

Mitomycin c

Molybdenum

Monochloroethylene

Monoethanolamine\*

Monoisopropylamine

Monomethyl ether hydroquinone

Monopropylene Glycol

Morpholine

Muscimol

Naphtha

Naphthalene

1,4-naphthoguinone

Napthylamine-beta (solid)

Nitric Acid

Nitric Oxide

Nickel\*

Nitroaniline-p (solid)

Nitrobenzene\*

Nitrodium-n-butylamine-N

Nitroglycerin (glyceryl)

Nitropropene-2

Nitrophenol\*

Nitrophenol-4 (solid)

2,4-dinitrophenol

2-nitropropane

Nitrosopipindine-n

Nitrosuliethylamine-n

Nitro-o-toluidine-5

Nitroso-N-ethylurea-N

Nitroso-N-methylurea-N

N-nitrosodi-N-propylamine

m-Nitrotoluene

2.6-dinitrotoluene

Nonanal

Nonene

tert-nonyl mercaptan

Novalar resins

Octane

Octanol

n-Octyl Mercaptan\*

Orthovanillin

Paraldehyde

Pelargonic Acid\*

Pentachlorobenzene

Pentachloroethane

n-pentane

Pentanol

n-Pentanoic Acid\*

## APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS Permit Number 4802/PSDTX1260

Page 7

Pentenenitrile 3-pentenenitrile Perchloroethylene Petroleum Distillates

Petroleum Distillates, Hydraulic Fluid

Petroleum Oil Phenacetin Phenanthrene\*

Phenol

2,4 bis(alpha, alpha-dimethyl benzyl)

phenol)

Phenothiazine

4-bromophenyl phenyl ether

Phenyl mercaptan Phosgene\*

Phosphine\*

Phosphorus Pentasulfide

Phthalic anhydride

Pinene-alpha Pinene-beta

Piperylene

Poast herbicide

Polyester Glycol

Polyethylbenzene

Polyethylene.

Polyethylene glycol dimethyl ether

Polyisobutyleneamine Polyoxyalkyleneamine

Polypropylene\* Polystyrene

Potassium Acetate Potassium Carbonate

Process Oil Promamide Propane

2-amino-1,3-propanediol

2-amino-2-ethyl-1,3-propanediol 2-amino-2-methyl-1,3-propanediol

Propane Sultone

Propanil Propanol

2-amino-2-methyl-propanol

Propargyl Alcohol\*

Propionaldehyde\* Propionic Acid

Propionitrile

Propionitrile, 3-chloro

Propyl Acetate Propylamine Propyl Heptenal

n-nitrosodi-n-propylamine

Propylene

Propylene Dichloride Propylene Glycol\*

Propylene Glycol Acetate

Propylene Glycol Methyl Ether

Propylene Glycol Monoethyl Ether

Propylene Glycol Monoethyl Ether Acetate

Propyleneimine, inhibited

n-Propylmercaptan\*

Propxur Pyridine\*

Pyridine, 4-amino

n-nitrosopyrrolidine

n-vinyl-2-pyrrolidinone

Quaternarium Salts Quintozene (solid)

Reactive Sulfides

Red Oil Reserpine Resorcinol Rhodium\*

Safrole Sassafras Oil Selenium\* Soap

Sodium Hydroxide\* Sodium Hypochlorite Sodium Methoxide Sodium Methylmeraptide

Sodium Nitrate Sodium Sulfate\* Sodium Sulfide Sodium Thiosulfate\*

## APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS

Permit Number 4802/PSDTX1260

Page 8

Sosafrole-1

Succinic acid

Succionitrile

Sulfolane

Sulfur\*

Styrene

Sulfate Turpentine

Sulfolane

Sulfurized isobutylene

Taxol

Terbufos

Terphenyl

Tert Amyl Alcohol

Tert Butyl Alcohol

Di-tert nonyl polysulfide (TNPS)

Tertiary amine

Tetrachloroethane

Tetrachloroethylene

Tetraethylene Glycol

Tetrahydrofuran

Tetrahydrothiophene

Thiamethoxam

Thioacetamide (solid)

Thiofanox

1-acety1-2-throurea

Thiourea (2-chlorophenyl)-

TDI Polymers\*

Thiosemicarbazide (solid)

Titanium tetrachloride

Toluene

Toluene Diamine\*

o-toluenediamine

2.4-toluene diisocyanate

2,6-toluene diisocyanate

o-toluic acid

Toluidine

Toluidine hydrochloride-o

4-chloro-o-toluidine hydrochloride

Toxaphene\*

Triallyl Amine\*

Tributylamine

Tributyl phosphate

1,2,4-Trichlorobenzene

1,1,1-Trichloroethane

1,1,2-Trichloroethane

Trichloroethene

Trichloroethylene

Trichlorofluoromethane

Tridecane

Triethanolamine\*

Triethylamine\*

Triethylene Glycol

Trifluralin

Trimellitic Anhydride

Trimethylbenzene

Tripolyamine

Tri-n-propylamine\*

2,4,6-Trinitrophenol\*

Trypan blue

Undecane

Uracil Mustard

n-Valeraldehyde

4-keto-1-valeric acid

Vanillin

Vinyl Acetate

Vinyl Acetate Polymer

Vinyl Chloride

4-Vinyl cyclohexene-1\*

Vinyl Methyl Ether

Vinylidene

Vinylidene Chloride

Vinyltrimethoxysilane

Warfarin\*

p-Xylene

Xylene

Aylene

Xylidine (p-dimethylaminoazobenzene)

\* These compounds are subject to the emission rate limits of the July 2004 dispersion modeling report.

Dated: month day, 2012

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## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

#### Permit Number 4802/PSDTX1260

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data **Emission Rates** Air Contaminant **Emission Point** Source Name (2) Name (3) No. (1) lbs/hour TPY (4) 5.70 25.00  $Cl_2$ 0.18 CO 0.84 22.67 6.06  $H_2SO_4$  (10)

HCl   0.28   1.23   162.90   1.247			112004 (10)	0.00	
104   Regeneration Unit No. 2 Stack (8)   PM			HCl	0.28	1.23
PM <sub>10</sub>		D 2 C4 - 1- (0)	$\mathbb{A}$ NO <sub>x</sub>	37.20	162.90
PM2.5   4.01   12.47   5475.00   12.50.00   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.01   0.02   0.00   0	104	Regeneration Unit No. 2 Stack (8)	PM 💽	4.01	12.47
104   Regeneration Unit No. 2 Stack (9)   CO   0.01   CO   0.02   CO   0.01   0.02   CO   0.01   CO   0.02   CO   0.01   CO   0.04   CO   0.05   CO   0.01   CO			$PM_{10}$	4.01	12.47
VOC   0.01   0.01   0.01			PM <sub>2.5</sub>	4.01	12.47
VOC   0.01   0.01   0.01			$SO_2$	1250.00	5475.00
104   Regeneration Unit No. 2 Stack (9)   H; SO <sub>4</sub> (10)   7.19   0.05   20.99   0.70   37.20   61.95   7.19   0.70   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.19   0.70   7.10   0.70   0.			VOC VOC		0.01
HSQ4 (10)   7.19   20.99   0.70   1.10   0.16   0.70   1.10   0.16   0.70   1.10   0.16   0.70   1.10   0.16   0.70   1.10   0.16   0.70   1.10   0.16   0.70   1.10   0.10   1.2.47	17 (17 (17 (17 (17 (17 (17 (17 (17 (17 (		⊒ Cl <sub>2</sub>		######################################
104   Regeneration Unit No. 2 Stack (9)   Regeneration Unit No. 2 Stack (9)   PM   4.01   12.47   PM10   4.01   12.47   PM2.5   4.01   12.47   PM2.5   377.78   VOC   0.01   0.01			CO E		604000000
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$			H <sub>2</sub> SO <sub>4</sub> (10)		A32 32 32 3
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$				9 <sub>8</sub>	A CONTRACTOR AND A CONT
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	104	D VI I VI I DI 2 Starle (0)	$NO_x$	37.20	
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	104	Regeneration Unit No. 2 Stack (9)	PM		
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$			$PM_{10}$		
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$			$PM_{2.5}$	4.01	į
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$		14			
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$		,	VOC	0.01	0.01
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$			СО	1.51	3.33
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$			$NO_x$	1.80	3.96
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	120			0.14	0.30
VOC   0.10   0.22	120	Standby Operation for Backup		0.01	0.02
Vapor Combustor (6)  (Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months)  Vapor Combustor (6)  HCl  NO <sub>x</sub> PM <sub>10</sub> SO <sub>2</sub> O.40  0.27  0.04  0.32  PM <sub>10</sub> SO <sub>2</sub> O.01  VOC  22.22  3.41			VOC	0.10	0.22
Vapor Combustor (6)  120  Vapor Combustor (6)  (Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months)  PM <sub>10</sub> SO <sub>2</sub> VOC CO 0.40 0.27 0.04 0.04 0.32 0.01 0.01 0.01			$Cl_2$	0.14	0.09
120 (Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months) NO <sub>x</sub> 0.48 0.32 PM <sub>10</sub> 0.04 0.02 SO <sub>2</sub> 0.01 0.01 VOC 22.22 3.41			СО	0.40	0.27
120 (Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months) (Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months) (SO <sub>2</sub>		Vapor Combustor (6)	HC1	0.06	0.04
1,314 hours per rolling 12-months)  PM <sub>10</sub> SO <sub>2</sub> VOC 22.22 3.41	120		$NO_x$	0.48	0.32
SO <sub>2</sub> 0.01 0.01 VOC 22.22 3.41	120			0.04	0.02
		, , ,		0.01	0.01
128 Regenerator No. 2 Preheater CO 2.07 1.03			_	22.22	3.41
	128	Regenerator No. 2 Preheater	СО	2.07	1.03

Emission Sources - Maximum Allowable Emission Rates

Emission Point		Air Contaminant	- Emiss	ion Rates
No. (1)	Source Name (2)	Name (3)	lbs/hour	TPY (4)
	(1,000 hours per rolling 12-months)	NO <sub>x</sub> PM <sub>10</sub> SO <sub>2</sub> VOC	2.46 0.19 0.02 0.14	1.23 0.10 0.01 0.07
170	Vapor Combustor 2 Normal Operation	CO NO <sub>x</sub> SO <sub>2</sub> VOC	4.28 2.15 0.01 0.08	0.30 0.15 0.01 0.01
170	Vapor Combustor 2 (6) (Furnace Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months)	Cl <sub>2</sub> CO HCl NO <sub>x</sub> SO <sub>2</sub> VOC	0.40 15.30 2.07 1.78 2.02	0.03 4.85 0.13 0.57 0.13
170 CATSCNR2	Vapor Combustor 2 (6) (Storage Tanks 48, 49, 53, and 56 Planned inspection Purge Control Option One)  Catalyst Screening for Regeneration Unit No. 2 Converter (6)	$\begin{array}{c} \text{CO} \\ \text{NO}_{x} \\ \text{SO}_{2} \\ \text{VOC} \\ \end{array}$	10.81	1.48 0.17 0.01 0.01 0.01 0.01 0.01
MSS-HAZTK1	Hazardous Waste Tanks (F2, F3) and T554, Planned MSS Purge (6)	Voc	0.02	0.01
MSS-HAZTK2	Hazardous Waste Tanks (B1, B2, H1, and H2) Planned MSS Purge (6)	VOC	0.01	0.01
TKINSPMSS1	Tank 78 Planned Inspection Purge (6)	CO C <sub>2</sub> H <sub>4</sub> NO <sub>x</sub> SO <sub>2</sub> VOC (7)	3.04 0.01 1.12 0.08 0.05	0.75 0.01 0.35 0.09 0.06
TKINSPMSS2	Tanks 48, 49, 53, and 56 Planned Inspection Purge (6)	CO C <sub>2</sub> H <sub>4</sub> NO <sub>x</sub> SO <sub>2</sub> VOC (7)	3.04 0.01 1.12 0.08 0.05	0.40 0.01 0.19 0.01 0.01
FE2	Process Fugitives (5)	SO <sub>2</sub>	0.05	0.20
FE3	Process Fugitives (5)	SO <sub>2</sub>	0.01	0.03
FE-12	Fugitives from HW Equipment (5)	VOC	0.04	0.19

Emission Sources - Maximum Allowable Emission Rates

Emission Point		ion Rates		
No. (1)	Source Name 121		lbs/hour	TPY (4)
FE-13	Fugitives from HW Equipment (5)	VOC	0.02	0.10
FE-14	Fugitives from HW Equipment (5)	VOC	0.01	0.01
FUG-SA1	Spent Acid Process Fugitives (5)	H <sub>2</sub> SO <sub>4</sub> SO <sub>2</sub> VOC	0.41 0.12 0.09	1.79 0.37 0.35
FUG-SA2	Spent Acid Process Fugitives (5)	H <sub>2</sub> SO <sub>4</sub> SO <sub>2</sub> VOC	0.07 0.03 0.02	0.31 0.08 0.07
FUG-SA3	Spent Acid Process Fugitives (5)	H <sub>2</sub> SO <sub>4</sub> SO <sub>2</sub> VOC	0.03 0.06 0.03	0.11 0.18 0.08
FUG-SA4	Spent Acid Process Fugitives (5)	H <sub>2</sub> SO <sub>4</sub> SO <sub>2</sub> VOC	0.30 0.13 0.08	1.34 0.38 0.30

- (1) Emission point identification either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3)  $C_2H_4$  ethylene
  - CO carbon monoxide
  - Cl<sub>2</sub> chlorine
  - H<sub>2</sub>SO<sub>4</sub> = sulfuric acid
  - HCl hydrogen chloride
  - NO<sub>x</sub> total oxides of nitrogen
  - PM particulate matter greater than 10 microns in diameter
  - PM<sub>10</sub> particulate matter (PM) equal to or less than 10 microns in diameter.
  - $PM_{2.5}$  particulate matter equal to or less than 2.5 microns in diameter
  - SO<sub>2</sub> sulfur dioxide
  - VOC volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Planned startup, shutdown, and maintenance emissions
- (7) Ethylene emissions are not included in the VOC emission total.
- (8) Pre emission control
- (9) Post emission control effective on and after April 1, 2014
- (10) PSDTX1260 pollutant

Permit Number 4802/PSDTX1260
Page 4

## Emission Sources - Maximum Allowable Emission Rates

Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/day 24 Days/week 7 Weeks/year 52

Date: month day, 2012

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# AIR, PESTICIDES, AND TOXICS 6<sup>TH</sup> FLOOR RECORDS CENTER INFILING / NEW FILE FORM

	New File	OR	Infiling	X	
Choose from the file	types below:		,		
AIR FACILITY:		<u>TSCA</u>	<u>:</u>		
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( CB - Confide	ntial Business		AS or AW - A Worker Prote	Asbestos o	r Asbesto
( D ) CO - Complia			CB - Confide	ntial	
( EN - **Enfor			FI - Site Spe		
( GE - General			FO - Non Site		
(PE - Permit			IM - **Section	n 5 & 8	
( RA - Regulate	ory Applicability		LB - **Lead	•	•
() Other			PC - **PCB	•	-
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Requestor's Name &	Phone Number:				
	Les Kova	1	X	47 <i>33</i>	

## Program Management Files:

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9<sup>th</sup> Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

EXR - External Relations

GEO - Geographical Summary Data

GRA - Grants Administration

The majority of this section requires the Fiscal Year accompany file code. Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

OPP - Operating Permits Program

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

**REG** - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program

fart it of Phodia

## RHODIA INC.

Houston Plant Houston, Texas

## TCEQ Permit Amendment Application

June 2011



trinityconsultants.com

# RECEIVED IT JUNIO PM 3: 04 6PD-S SEUTION EPA DALLAS.TX



Eco Services Enterprise Houston Plant

## CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1694)

June 3, 2011

Texas Commission on Environmental Quality Air Permits Division Air Permits Initial Review Team, MC-161 P.O. Box 13087 Austin, TX 78711-3087

Re:

Rhodia, Inc.

Houston, Texas Permit Amendment

TCEQ Air Permit No.: 4802 Account No.: HG-0697-O

TCEQ Customer Reference No: CN600125330 TCEQ Regulated Entity No.: RN100220581

#### Dear Sir or Madame:

Rhodia Inc. owns and operates a facility, the Houston plant in Houston (Harris County), Texas. The Regeneration Unit No. 2 currently operates under the Texas Commission on Environmental Quality (TCEQ) Account Number HG-0697-O. With this submittal, Rhodia is proposing to amend its existing Permit Number 4802 to allow for the installation of a sulfur dioxide abatement system and capacity expansion.

Rhodia entered into a Consent Decree with the US Environmental Protection Agency and the US Department of Justice in 2007. In the Consent Decree settlement, Rhodia agreed to install sulfur dioxide abatement at four of its sulfuric acid manufacturing facilities. The Houston plant's No. 8 Unit, TCEQ Permit Numbers 19282 and PSD-TX-1081, had its sodium based sulfur dioxide scrubber started up in November 2009. Regeneration Unit No. 2 is the last of the four sulfuric acid units to have sulfur dioxide abatement installed. The Consent Decree compliance date for Regeneration Unit No. 2 is April 1, 2014.

Rhodia requests the TCEQ give this amendment request for Permit Number 4802 a higher priority for review to enable the installation and start-up of the sulfur dioxide abatement system by the Consent Decree's April 1, 2014 deadline.

TCEQ Regen 2 Permit Amendment Page 2

A copy of this application has been sent to the TCEQ Region 12 Office in Houston, the City of Houston's Bureau of Air Quality Control and to Harris County Pollution Control Department. The registration fees have been sent separately to the Revenue Section of the TCEQ.

If there are any questions, please contact me at (713) 924-1408.

Sincerely,

W. F. Dickerson

Environmental Manager

#### Attachments

cc: Mr. Manuel Bautista, TCEQ Region 12 – Houston

Mr. Arturo Blanco, City of Houston, Bureau of Air Quality Control

Mr. Bob Allen - Harris County Pollution Control Department

EPA Region 6, Air Permits Division - Dallas

## TCEQ PERMIT AMENDMENT APPLICATION RHODIA INC. • HOUSTON PLANT

TCEQ ACCOUNT NUMBER HG-0697-O TCEQ PERMIT NO. 4802

Prepared by:

TRINITY CONSULTANTS 1001 West Loop South Suite 640 Houston, TX 77027 (713) 552-1360

June 2011

Project 114402.0054

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ΑF	PENDD	G. EXCERPTS FROM CONSENT DEGREE	
		K H. ALTERNATE MONITORING PLAN	

Rhodia Inc. (Rhodia) owns and operates a sulfuric acid manufacturing plant in Houston, Harris County, Texas (Houston Plant). The facility produces sulfuric acid by two processes: combusting elemental sulfur and regenerating spent sulfuric acid (sulfuric acid received from petroleum refining and chemical processes that has been in contact with volatile organic compounds). The facility operates an industrial furnace used to regenerate spent sulfuric acid and commercially incinerate liquid hazardous wastes. The Houston Plant currently operates under the Texas Commission on Environmental Quality (TCEQ) account number HG-0697-O. Rhodia has a TCEQ Customer Reference Number CN600125330 and the Houston plant is registered with a Regulated Entity Number RN100220581.

Rhodia's Sulfuric Acid Regeneration Unit No. 2 (Regen 2) is permitted under TCEQ Permit No. 4802. Regen 2 is an industrial furnace, which produces sulfuric acid from spent sulfuric acid, elemental sulfur, and commercially incinerates liquid hazardous wastes. The storage tanks that hold spent sulfuric acid product and raw material unloading operations are in this permit.

Rhodia entered a consent decree (2:07CV134WL) with the EPA and Department of Justice in August 2007. As part of the consent decree requirements, Rhodia is proposing to install a wet scrubber in Regen 2 for sulfur dioxide (SO<sub>2</sub>) reduction at the Houston Plant. Also, as part of this permit amendment application, Rhodia intends to increase production rate of sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) to 1,150 tons/day.

Additionally, as part of this amendment application, Rhodia proposes to add particulate matter (PM), PM with an aerodynamic diameter of less than 10 microns (PM<sub>10</sub>), and PM with an aerodynamic diameter of less than 2.5 microns (PM<sub>2.5</sub>) emissions to TCEQ permit number 4802 for EPN 104. These are existing emissions which were never authorized as such in the permit since the majority of the PM are "condensables" and EPA only recently came out with a test method to sample and quantify these. On March 4, 2011, a meeting was held among the Rhodia, the TCEQ (Dana Vermillion and Johnny Vermillion), and Trinity Consultants Inc. (Trinity) in Austin, Texas. During this meeting, it was agreed that the majority of PM emissions were due to sulfuric acid. Therefore, even though the representation of PM<sub>10</sub>/PM<sub>2.5</sub> was not explicit in the TCEQ permit 4802, the TCEQ allowed the inclusion of PM<sub>10</sub>/PM<sub>2.5</sub> as a reconciliation effort. However, the TCEQ recommended that a "retrospective" PSD analysis for PM<sub>10</sub>/PM<sub>2.5</sub> to be performed for each permit action since the PSD rules became effective. Therefore, as part of this application all relevant federal new source review (FNSR) pollutants have been analyzed during the "retrospective" study. The reconciliation of PM/PM<sub>10</sub>/PM<sub>2.5</sub> and study of historical permit amendments for potential PSD review are included in this application.

Rhodia wishes to address the following items in this permit amendment:

- Add a two-stage wet scrubber after SO<sub>2</sub>-laden gas leaves the Brinks mist eliminator. This process will remove the majority of the SO<sub>2</sub> and convert it to different salt forms. It will drastically reduce the emission of SO<sub>2</sub> from the stack. Sodium hydroxide or soda ash may be used as the alkali to feed the scrubber.
- ▲ To support the capacity increase to 1,150 tons of acid/day, Rhodia proposes following modifications, as needed:
  - (1) Add an additional sulfur gun to furnace,
  - (2) Increase catalyst loading in the convertor,
  - (3) Increase size of spent acid feed pump,
  - (4) Replace precipitators, scrubbing tower, and main gas blower steam injectors, and
  - (5) Replace drying tower circulation pump to increase circulation rate.
  - Please note that this is not an all encompassing list but is the best estimate of changes/additions to significant equipment at this point of time in order to get the increased capacity.
- A Review and update all special conditions for current permit to reflect pollution reduction and production increase.
- ▲ Shutdown the existing Unit No. 2 Stack (EPN 104) and route emissions to a new stack near the newly proposed scrubber and assign EPN 104 to it. Reevaluate emission rates for SO<sub>2</sub>, oxide of nitrogen (NO<sub>x</sub>), H<sub>2</sub>SO<sub>4</sub>, hydrogen chloride (HCl), chlorine (Cl<sub>2</sub>), and carbon monoxide (CO) from the proposed EPN 104.
- ▲ Reconcile PM<sub>10</sub> and PM<sub>2.5</sub> emissions and perform retrospective PSD analysis for all permit amendments since 1977.
- Add MSS activity for sulfuric acid catalyst screening and authorize related PM<sub>10</sub>/PM<sub>2.5</sub> emissions associated with this MSS activity (proposed EPN CATSCNR2).
- ▲ Remove Special Conditions 2, and 3 from current permit to accommodate the SO<sub>2</sub> abatement project. The following is an excerpt of these conditions:
  - 2. The sulfur dioxide ( $SO_2$ ) emissions from Regeneration Unit No. 2 shall not exceed 15 tons measured over any continuous 24-hour period.

The holder of this permit shall maintain equipment as described in it permit application which will automatically cause the operation of Regeneration Unit No. 2 to cease if the  $SO_2$  emissions exceed for a 30 minute period at a rate which would cause more than 15 tons of  $SO_2$  to be emitted over a 24-hour period.

- 3. Opacity of emission from the Unit NO. 2 stack shall not exceed 20 percent averaged over a five-minute period.
- ▲ Increase the number of railcars that can be depressurized at any one time from 6 to 8.
- ▲ Add following chemicals to the Approved Chemical List for Hazardous Waste Operations in TCEQ permit 4802:
  - (1) 4-aminophenol (Cas No: 123-30-8), and
  - (2) Diethylaminoacetone (Cas No.: 1620-14-0).

The proposed production increase will also require an increase in the throughput of molten sulfur, which is currently authorized in TCEQ permit 56566. Therefore, permit 56566 will need to be amended, and a permit amendment application to that effect will be submitted to the TCEQ concurrently or soon after this submittal.

Section 2 of this registration contains a completed TCEQ Form PI-1 and Table 1(a). An area map indicating the site location and a plot plan identifying the location of various sources are included in Section 3 and Section 4 of the report. A process flow diagram is provided in Section 5. Process description is included in Section 6. A description on the emission calculations are provided in Section 7. Federal new source review (FNSR) analysis for this project is presented in Sections 8. Historical application FNSR study is provided in Section 9. Permit fee and P.E. certification are provided in Section 10. Material balance is provided in Section 11. Best Available Control Technology (BACT) is illustrated in Section 12. Compliance with general and administrative requirements is demonstrated in Section 13. Air Quality analysis is included in Section 14. Additional impact analysis is included in Section 15. Air quality related values (AQRV) analysis is provided in Section 16. Appendix A includes detailed emission rate calculations, Appendix B includes stack test results. Project increase and netting analysis are in Appendix C. RBLC search is in Appendix D. Land use determination, AERSURFACE results and U.S. Census data are in Appendix E. AERMOD modeling parameters and electronic copies of modeling files are in Appendix F.

PI-1

<u>Update</u>: The TCEQ requires that a Core Data Form be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number have been issued by the TCEQ <u>and</u> no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ Web site at <a href="https://www.tceq.state.tx.us/permitting/central\_registry/guidance.html">www.tceq.state.tx.us/permitting/central\_registry/guidance.html</a>.

I. APPLICANT INFORMATIO	)N				
A. Company or Other Legal Name: Ri	nodia Inc.	,			
Texas Secretary of State Charter/Regist	tration Number (if applicable)	):			
B. Company Official Contact Name (	☑ Mr. ☐Mrs. ☐Ms. ☐Dr.)	): Willi	am J. McConn	ell	
Title: Plant Manager					
Mailing Address: 8615 Manchester Stre	eet				
City: Houston	State: TX			ZIP Code: 770	012
Telephone No: 713-924-1401	Fax No.: 713-835-3252		E-mail Addre William.McC	ss: onnell@us.rho	dia.com
C. Technical Contact Name ( Mr.	□Mrs. □Ms. □Dr.): Floyd	Dicker	rson		
Title: Environmental Manager					
Company Name: Rhodia Inc.					
Mailing Address: 8615 Manchester Stre	eet				
City: Houston	State: TX			ZIP Code: 770	012
Telephone No.: 713-924-1408	Fax No.: 713-835-3261	E-ma	il Address: Flo	yd.Dickerson(	@us.rhodia.com
D. Facility Location Information:					
Street Address: 8615 Manchester Stree	t				
If no street address, provide clear driving	ng directions to the site in wr	iting:		<u></u>	
City: Houston	County: Harris			ZIP Code: 77	012
E. TCEQ Account Identification Num	ber (leave blank if new site o	or facili	ity): HG-0697-	·O	
F. Is a TCEQ Core Data Form (TCEQ	Form No. 10400) attached?				☐ YES ⊠ NO
G. TCEQ Customer Reference Number	er (leave blank if unknown): (	CN600	125330		
H. TCEQ Regulated Entity Number (I	leave blank if unknown): RNI	00220	581		
II. IMPORTANT GENERAL II	NFORMATION				
A. Is confidential information submitt	ed with this application?				☐ YES 🛭 NO
If "YES," is each "confidential" page r	narked "CONFIDENTIAL"	in larg	ge red letters?		☐ YES ☐ NO



II. IMPORTANT GENERAL INFORM	ATION (continue	ed)			
B. Is this application in response to a TCE	. Is this application in response to a TCEQ investigation or enforcement action? ☐ YES ☒ NO				
If "YES", attach a copy of any corresponde	nce from the TCE	Q			
C. Number of New Jobs: None					
D. Names of the State Senator and district	number for this fa	cility site: Senate District 65	Senator Mari	o Gallegos	
Names of State Representative and dist	rict number for thi	s facility site: House District	143 Ana E.	Hernandez	
E. For Concrete Batch Plants, and PSD, or for this facility site:	Nonattainment Pe	ermits that require public noti	ce, name of 1	he County Judge	
Mailing Address:			r		
City:	State:		ZIP Code:		
F. For Concrete Batch Plants, is the facilit of a municipality?	y located in a mun	icipality or an extraterritorial	jurisdiction	☐ YES ☐ NO	
If "YES," list the name(s) of the Presiding (	Officer(s) for this t	facility site:			
Mailing Address:					
City:	State:		ZIP Code:		
III. FACILITY AND SOURCE INFO	DRMATION				
A. Site Name: Houston Plant					
B. Area Name/Type of Facility: No. 2 Reg	en Unit		Permar	nent Portable	
C. Principal Company Product or Business	s: Manufactures su	ılfuric acid			
Principal Standard Industrial Classifica	tion Code: 2819				
<b>D.</b> Projected Start of Construction Date: P	ending	Projected Start of Operation	n Date:	April 1, 2014	
IV. TYPE OF PERMIT ACTION RI	QUESTED				
A. Permit Number (if existing): 4802					
B. Is this an initial permit application?  ☐ YES ☒ NO					
If "YES," check the type of permit requested (check all that apply):  State Permit  Nonattainment Federal Permit  Flexible Permit  Prevention of Significant Deterioration Federal Permit  Multiple Plant Permit  Hazardous Air Pollutants Permit Federal Clean Air Act § 112(g)  Other:					



IV. TYPE OF PERMIT ACTION REQ	UESTED (continued)	
C. Is this a permit amendment?		⊠ YES □ NO
Is this a permit revision?? (SB 1126 chang	ge)	☐ YES ☒ NO
If "YES," check the type of permit requested (  State Permit Amendment  Flexible Permit Amendment  Multiple Plant Permit Amendment  Nonattainment Major Modification  Prevention of Significant Deterioration Ma  Hazardous Air Pollutants Permit Federal Cother:	ajor Modification	
D. Is a permit renewal application being submaccordance with Senate Bill 1673? [THSC	nitted in conjunction with this amendment in 2 382.055(a)(2)](80 <sup>th</sup> Legislative)	☐ YES 🖾 NO
E. Is this application for a change of location	☐ YES 🖾 NO	
If "YES," answer IVE. 1 IVE. 4.		
Current location of facility:		
Street Address (If no street address, provide c	lear driving directions to the site in writing.):	
City:	County:	ZIP Code:
2. Proposed location of facility:		
Street Address (If no street address, provide c	lear driving directions to the site in writing.):	
City:	County:	ZIP Code:
	lan meet all current technical requirements of the	☐ YES ☐ NO
If "NO," attach detailed information.		
4. Is the site where the facility is moving cor	nsidered major?	☐ YES ☐ NO
F. Is this a relocation?		☐ YES ☒ NO
<b>G.</b> Are there any standard permits, exemption permit?	ns or permits by rule to be consolidated into this	☐ YES ⊠ NO



IV. TYPE OF PERMIT ACTION REQUESTED (continued)				
H. Are you permitting a facility or group of facilities that have planned maintenance, startup and shutdown emissions that cannot be authorized by a permit by rule or standard permit or that are authorized by a permit by rule or standard permit and are being rolled into this permit?	I ☐ YES ⊠ NO			
If "YES," attach information on any changes to emissions under this application as specified in S	ections IX, and X.			
If "YES," answer IVH. 1 -IVH. 3.				
1. Are the activities to be included in this permit covered by any previously existing MSS authorizations?	☐ YES ☐ NO			
If "YES," provide a listing of all other authorizations (permit by rule or standard permit and the a number if any).	ssociated registration			
2. Have the emissions been previously submitted as part of an emissions inventory?	☐ YES ☐ NO			
3. List which years the MSS activities were included in emissions inventory submittals:				
I. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability)				
Is this facility located at a site required to obtain a federal operating permit YES NO To be Determined under 30 TAC Chapter 122?				
1. Identify the requirements of 30 TAC Chapter 122 that will be triggered if this PI-1 application	n is approved.			
FOP Significant Revision FOP Minor Application for an FOP Revision				
Operational Flexibility/Off-Permit Notification Streamlined Revision for GOP 🛛 To be d	letermined None			
2. Identify the type(s) of FOP(s) issued and/or FOP application(s) submitted/pending for the site	e (check all that apply)			
☐ GOP Issued ☐ GOP application/revision application: submitted or under APD review ☐ SOP Issued ☐ SOP application/revision application: submitted or under APD review				
V. PERMIT FEE INFORMATION				
A. Fee paid for this application:	\$50,000.00			
1. Is a copy of the check or money order attached to the original submittal of this application?	ES 🗌 NO 🗌 N/A			
2. Is a Table 30 entitled, "Certification of estimated Capital Cost and Fee Verification," X Y attached?	ES NO N/A			



VI. PUBLIC NOTICE APPLICAB	BILITY			
A. Is this a new permit application or a c	change of location application	1?	☐ YES ☒ NO	
B. Is this an application for a major mod	lification of a PSD, NA or 30	TAC § 112(g) perm	it? ⊠ YES □ NO	
C. Is this a state permit amendment appl	lication?		⊠ YES □ NO	
If "YES," answer VIC. 1 VIC. 3.	1			
1. Is there any change in character of en	nissions in this application?		⊠ YES □ NO	
Is there a new air contaminant in this app	lication?		⊠ YES □ NO	
2. Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or vegetables fibers (agricultural facilities)? ☐ YES ☒ NO				
3. List the total annual emission increas	es associated with the applic	ation ( <i>list <u>all</u> that app</i>	oly):	
Volatile Organic Compounds (VOC):			0 tpy	
Sulfur Dioxide (SO <sub>2</sub> ):			0 tpy	
Carbon Monoxide (CO):			0 tpy	
Hazardous Air Pollutants (HAPs):			0 tpy	
Nitrogen Oxides (NO <sub>x</sub> ):			tpy	
Particulate Matter (PM):			12.47 tpy	
PM <sub>10</sub> :			12.47 tpy	
PM <sub>2.5</sub> :			12.47 tpy	
Lead (Pb):			0 tpy	
Other air contaminants not listed above: l	H <sub>2</sub> SO <sub>4</sub>		0 tpy	
VII. PUBLIC NOTICE INFORMA	TION (complete if applicab	le)		
A. Responsible Person:				
Name (Mr. Mrs. Ms. Dr.): Fl	oyd Dickerson	•		
Title: Environmental Manager				
Mailing Address: 8615 Manchester Stree	t			
City: Houston	State: TX	·	ZIP Code: 77012	
Telephone No.: 713-924-1408	Fax No.: 713-835-3261	E-mail Address: Flo	yd.Dickerson@us.rhodia.com	



TION (complete if applica	ble)	
oyd Dickerson		
t		
State: TX		ZIP Code: 77012
Fax No.: 713-835-3261	E-mail Address: Flo	yd.Dickerson@us.rhodia.com
brary - Melcher Neighborh	ood Library	
County	: Harris	
n to place the application for	or public viewing and	copying? XES NO
lable for the public?		YES □ NO □ N/A
able.		
site:		
Box 1562		
State: TX	ZI	P Code: 77251
r for this facility site:		
State:	ZI	P Code:
dy for this facility site:		
State:	ZI	IP Code:
	oyd Dickerson  t  State: TX  Fax No.: 713-835-3261  brary - Melcher Neighborh  County n to place the application for able for the public?  able.  site:  State: TX  r for this facility site:	t  State: TX  Fax No.: 713-835-3261



VII. PUBLIC NOTICE INFORMAT	FION (complete if	applicable)			
E. Is a bilingual program required by th	e Texas Education	Code in the S	chool I	District?	⊠ YES □ NO
Are the children who attend either the elemeligible to be enrolled in a bilingual progr			ool clo	sest to your facility	⊠ YES □ NO
If "YES," which language is required by	the bilingual progr	ram?	Spanis	h	
VIII. SMALL BUSINESS CLASSIFI	CATION (require	ed)			
	A. Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts?				
B. Is the site a major source under 30 TA	AC Chapter 122, Fe	deral Operatir	ng Pern	nit Program?	⊠ yes □ no
C. Are the site emissions of any individu	ıal air contaminant	greater than 5	0 tpy?		⊠ YES □ NO
D. Are the site emissions of all air contar	minants combined	greater than 75	tpy?		⊠ YES □ NO
IX. TECHNICAL INFORMATION	4				
A. Is a current area map attached?				⊠ YES □ NO	
Are any schools located within 3,000 feet of this facility?				⊠ YES □ NO	
B. Is a plot plan of the plant property atta	ached?				⊠ YES □ NO
C. Is a process flow diagram and a proce	ess description attac	ched?			⊠ YES □ NO
D. Maximum Operating Schedule:	Hours: 24 hr/day	Day(s): 7 day	/s/wk	Week(s): 52 wk/yr	Year(s):8760 hr/yr
Seasonal Operation?					☐ YES ☒ NO
If "YES," please describe.					
E. Are worst-case emissions data and calculations attached?					⊠ YES □ NO
Is a Table 1(a) entitled, "Emission Point Summary Table," attached?				⊠ YES □ NO	
2. Is a Table 2 entitled, "Material Balance Table," attached?					⊠ YES □ NO
3. Are equipment, process, or control de	vice tables attache	d?			⊠ YES □ NO
F. Are actual emissions for the last two y	years (determinatio	n federal appl	icabilit	y) attached?	⊠ YES □ NO



X.	STATE REGULATORY REQUIREMENTS  Applicants must be in compliance with all applicable state regulations to obtain a permit or a	mendment.
A.	The emissions from the proposed facility will comply with all rules and regulations of the TCEQ and details are attached?	⊠ YES □ NO
В.	The proposed facility will be able to measure emissions of significant air contaminants and details are attached?	⊠ YES □ NO
C.	A demonstration of Best Available Control Technology (BACT) is attached?	YES □ NO
D.	The proposed facilities will achieve the performance in the permit application and compliance demonstration or record keeping information is attached?	⊠ YES □ NO
E.	Is atmospheric dispersion modeling attached?	☑ YES ☐ NO
F.	Does this application involve any air contaminants for which a "disaster review" is required?	☐ YES ⊠ NO
If"	YES," details must be attached.	
	te: For a list of air contaminants for which a "disaster review" will be required, refer to the NSRI idance Document at www.tceq.state.tx.us/permitting/air/rules/federal/63/63hmpg.html.	PD Disaster Review
G.	Is this facility or group of facilities located at a site within an Air Pollutant Watch List (APWL) area?	☐ YES ⊠ NO
If"	YES," answer X.G. 1 X.G. 3.	
1.	List the APWL Site Number:	
2.	Does the site emit a pollutant of concern for the APWL area in which the site is located?	☐ YES ☐ NO
3.	If "YES," list the pollutant(s) of concern emitted by this site:	
н.	Is this facility or group of facilities located at a site within the Houston/Galveston nonattainment area? (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, or Waller Counties)	⊠ yes □ no
If"	YES," answer X.H. 1 X.H. 4.	
1.	Does the facility or group of facilities located at this site have an uncontrolled design capacity to emit 10 tpy or more of $NO_X$ ?	⊠ YES □ NO
2.	Is this site subject to 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emissions Cap and Trade)?	⊠ yes □ no
3.	Does this action make the site subject to 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emissions Cap and Trade)?	☐ YES ⊠ NO
4.	Does this action require the site to obtain additional emission allowances?	☐ YES ⊠ NO



mit or amendment.  attachments  met, and include
⊠ YES □ NO
⊠ YES □ NO
⊠ YES □ NO
☐ YES ⊠ NO
⊠ YES □ NO
☐ YES ☒ NO
ES 🗌 NO 🗌 NA
⊠ YES □ NO
YES NO
⊠ YES □ NO
⊠ YES □ NO
⊠ YES □ NO
☐ YES ⊠ NO
☐ YES ☒ NO



XIII. PROFESSIONAL ENGINEER (P.E.) SEAL	
Is the estimated capital cost of the project greater than \$2 million dollars?	⊠ yes □ no
If "YES," the application must be submitted under the seal of a Texas licensed Professional Engineer (	(P.E.).
XIV. DELINQUENT FEES AND PENALTIES	
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or Attorney General on behalf of the TCEQ is paid in accordance with the "Delinquent Fee and Penalty Fees more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at:  www.tceq.state.tx.us/agency/delin/index.html.	
XV. SIGNATURE	
The signature below confirms that I have knowledge of the facts included in this application and that the and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and for which application is made will not in any way violate any provision of the Texas Water Code (TW Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCA that I understand my signature indicates that this application meets all applicable nonattainment, preve deterioration, or major source of hazardous air pollutant permitting requirements. I further state that I I understand TWC §§ 7.177-7.183, which defines CRIMINAL OFFENSES for certain violations, include or knowingly making or causing to be made false material statements or representations in this application, pertaining to CRIMINAL PENALTIES.	Id belief, the project C), Chapter 7, Commission on AA. I further state ention of significant have read and ding intentionally
NAME: William J. McConnell	
SIGNATURE: Milliam J. M. Econolist Original Signature Required	
DATE: 5/31/1	
<u> </u>	

#### Federal Regulatory Requirements for PI-1

Regen 2 is a sulfuric-acid making process. In addition, the furnace of the process combust RCRA wastes and other hazardous wastes from different industries. It has a FIN of PRO-REGEN2 in Title V Permit 3049.

40 CFR Part 60

Subpart A: General Provisions

Subpart Cd: Emissions Guidelines and Compliance Times for Sulfuric Acid Production Units

Subpart H: Standards of Performance for Sulfuric Acid Plants

40 CFR Part 61

Subpart FF: National Emission Standard for Benzene Waste Operations

40 CFR Part 63

Subpart G: National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater

Subpart XX: Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations Subpart GGG: Pharmaceuticals Production.

Table 1(a)



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

Date	6/1/2011 Permit No.:	4802	Regulated Entity No.:	RN100220581
Area Name	Houston Plant		Customer Reference	CN600125330

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

Keview of application			AIR CONTAMINANT DATA			
	1. Emission P	oint	2. Component or Air Contaminant Name	3. Air Contaminant Emission Rate		
(A) EPN	(B) FIN	(C) NAME		(A) Pounds per Hour :	(B) TPY	
104	PRO-REGEN2	Unit No. 2 Stack	со	5.70	25.00	
			CO <sub>2</sub> -e	43627.01	152869.03	
			Cl <sub>2</sub>	0.01	0.05	
			H <sub>2</sub> SO <sub>4</sub>	7.19	20.99	
	:		HCI	0.16	0.70	
			NO <sub>x</sub>	37.20	61.95	
			PM	4.01	12.47	
			PM <sub>10</sub>	4.01	12.47	
			PM <sub>2.5</sub>	4.01	12,47	
			SO <sub>2</sub>	143.75	377.78	
			voc	0.01	0.01	
CATSCNR2	CATSCNR2	Catalyst Screening	PM	6.57E-03	7.17E-04	
		for Regen 2 Converter	PM <sub>10</sub>	6.57E-03	7.17E-04	
			PM <sub>2.5</sub>	6.57E-03	7.17E-04	

EPN = Emission Point Number

FIN = Facility Identification Number



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

Date	6/1/2011	Permit No.:	4802	Regulated Entity No.:	RN100220581
Area Name		Houston Plant		Customer Reference No.:	CN600125330

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

		rmits will be expedited by supplying all n			E(O)NHEANMINA								
	1. Emissi	on Point	4. UTM	Coordinates Point	of Emission	5.	6. Height	7.	Stack Exit	irce Data	8	Fugitives	
(A) EPN	(B) FIN	(C) NAME	Zone	East (meters)	North (meters)	Building Height (ft.)	Above Ground (ft.)	(A) Diameter (ft.)	(B) Velocity (fps)	(C) Temperature (°F)	(A) Length (ft.)	(B) Width (ft.)	(C) Axis Degrees
104	PRO-REGEN2	Unit No. 2 Stack	15	280224	3290031		130	3.5	95.5	89			
CATSCNR2	CATSCNR2	Catalyst Screening for Regen 2 Converter	15	280213	3290019	i	8	0.67	164.0	70			
											1		

EPN == Emission Point Number

FIN = Facility Identification Number

TCEQ Table 13 (Scrubber or Wet Washers)

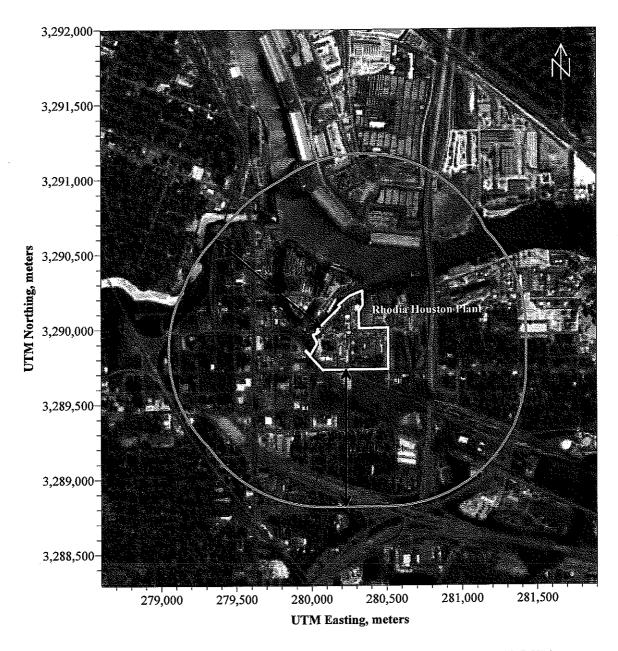
#### TABLE 13 SCRUBBERS OR WET WASHERS

Point Number(from Flow	Manufacturer & Model No. (if available)						
EPN 104							
Name of Abatement Dev	Type of Air Contamina	ant Controlled					
Sodium Based Scrubber i	for Regen 2		Sulfur Dioxide				
		GAS STREAM	CHARACTERISTICS				
Flow Ra	te (acfm)	· ·	as Stream perature (°F)		rticulate C iin/scf) O	Grain Loading ruflet	
Design Maximum	Average Expected	Inlet	Outlet			0.001 - 0.008 grain/scf	
60,300 (acfm inlet)	51,400 (acfm inlet)	140 – 220°F	70 – 100°F	0.001-0.008 g (roughly 0.05 mg/scf	to 0.5	(roughly 0.05 to 0.5 mg/scf)	
			TE DISTRIBUTION y Weight)				
Micron I	Range		Inlet		C	Outlet	
0.0-1.0 0.1-3.0 3.0-5.0 5-10 10-20		_	% % % %		% % % %		
over							
		SCRUBBING LIQU	JID CHARACTERISTIC				
	Scrubbing Liquid			Liquid Injection Rate (gpm)			
CompositionWt.% 1. NaHSO3 5 – 35 %	v4		Design Max	Design Maximum		Average Expected	
2. Na2SO3 0 - 15 9 3. Na2SO4 0 - 10 9	% %		Estimated 57	75 gpm		400-500 GPM	
4. H2O 65 – 90	70		Pressure at Nozzlen/a			essure Drop Through	
Type of Scrubber:  ☐ Spray Chamber ☐ Cyclone ☐ Mechanical			યો	☐ Venturi x Packed Tower Type			
С	ata for Venturi Scrubber			Data for Pac			
Throat Dimensio	ns T	hroat Velocity	Type of Pa		Su	perficial Gas Velocity	
(Specify Units)		(fil/sec) n/a	3 " superintalox equivalent (e.g. 3 ½ 90 mm Hiflo	" Flexirings or		through Bed 2-10.5 fl/s	
Capital Installed Cost \$_	5,000,000		Annual Operating	Cost \$			

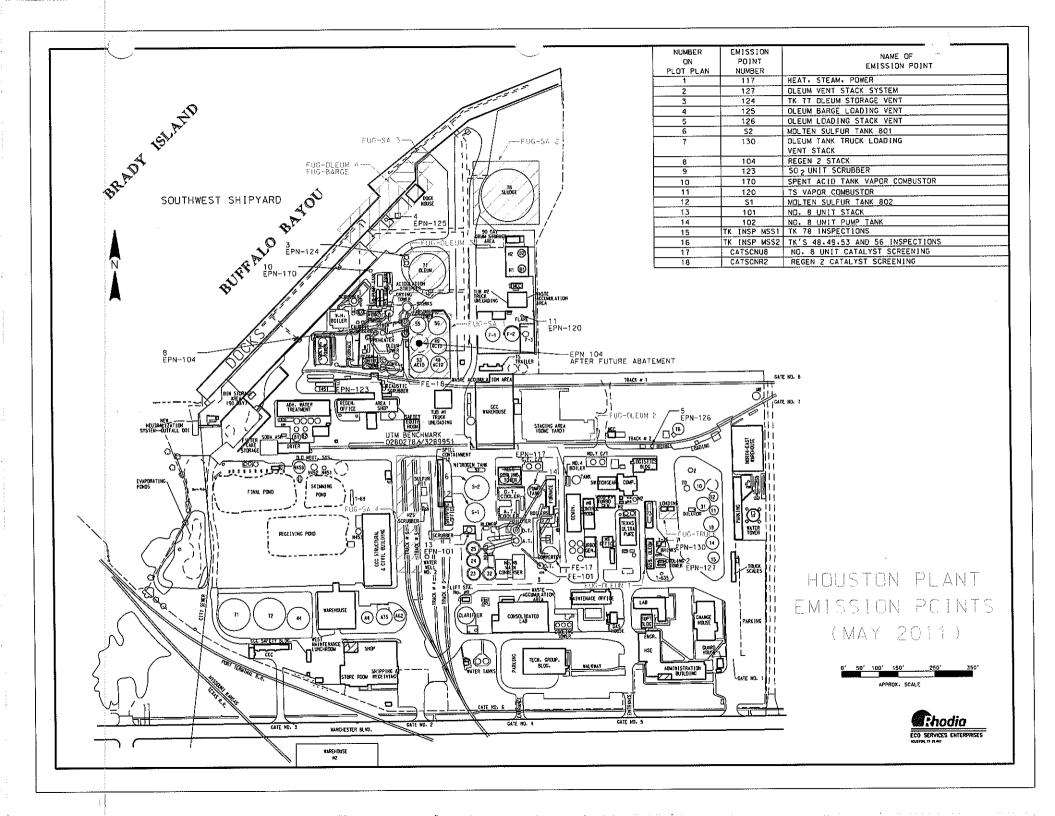
On separate sheets attach the following:

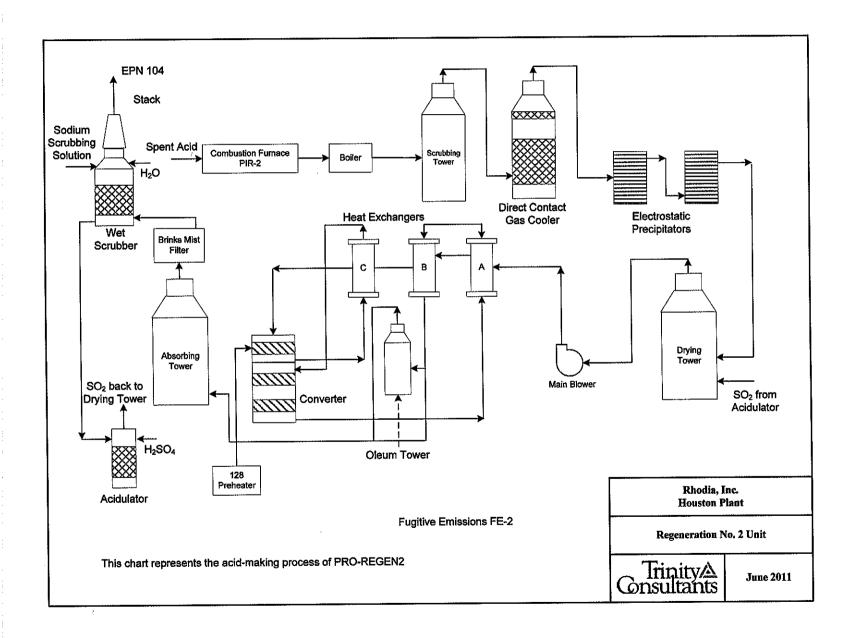
A. Details regarding principle of operation

B. An assembly drawing (Front and Top View) of the abatement device dimensioned and to scale clearly showing the design, size and shape. If the device has bypasses, safety valves, etc., include in drawing and specify when such bypasses are to be used and under what conditions.



Referenced Universal Transverse Mercator (UTM) coordinates are in North American Datum 83 (NAD 83) datum.





May 2011 Regen 2 - Catalyst Screening Rhodia, Inc. Houston Plant Ginsultants Consultants EPN: CATSCNR2 Catalyst Screening for PRO-REGEN2 Converter Filter

#### 6.1 REGEN 2 UNIT

The following section describes the technique used to convert spent sulfuric acid and sulfur to sulfuric acid at Rhodia's Sulfuric Acid Regeneration Unit No. 2. This process is made up of six main stages: combustion, wet gas purification, conversion, absorption, SO<sub>2</sub> recovery and heat recovery found throughout the process.

Spent sulfuric acid and molten sulfur are delivered to the facility by barge and tank truck. Sulfur is stored in two heated tanks and spent sulfuric acid is stored in five storage tanks. The spent sulfuric acid and molten sulfur are sprayed into the industrial furnace and burned at a high temperature with excess dry air to produce sulfur dioxide, as illustrated by the following equations. Liquid hazardous wastes are used as supplemental fuel and are combusted along with the spent sulfuric acid and the molten sulfur in the industrial furnace.

 $H_2SO_4$  (spent sulfuric acid) +  $O_2$  (oxygen) + heat  $\rightarrow SO_2$  (sulfur dioxide) + heat +  $H_2O$  (water)

$$S (sulfur) + O_2 (oxygen) \rightarrow SO_2 (sulfur dioxide) + heat$$

After leaving the furnace, the process gas stream containing sulfur dioxide is cooled in a waste heat boiler. The process gas then goes through gas cleaning, cooling, and mist removal equipment that consists of a scrubbing tower, a direct contact gas cooler and two electrostatic precipitators.

The sulfur dioxide, in gaseous state, is then reacted with dry air in a catalytic converter producing sulfur trioxide:

$$2SO_2$$
 (sulfur dioxide) +  $O_2$  (oxygen)  $\rightarrow 2SO_3$  (sulfur trioxide) + heat

The SO<sub>3</sub> stream passes through an oleum tower where product sulfuric acid is initially collected and a portion of SO<sub>3</sub> gas is removed. Finally, the remaining sulfur trioxide is absorbed in strong acid in an absorbing tower to produce sulfuric acid.

$$H_2O$$
 (water) +  $SO_3$  (sulfur trioxide)  $\rightarrow$   $H_2SO_4$  (sulfuric acid) + heat

The process gas then enters a Brinks mist eliminator where H<sub>2</sub>SO<sub>4</sub> mist is removed. Exhaust gas (containing residual SO<sub>2</sub>) leaves the Brinks mist eliminator and enters the bottom of the newly added sodium based wet scrubber. Different forms of sodium salts are formed when SO<sub>2</sub> contacts with Na<sub>2</sub>CO<sub>3</sub> solution.

Sodium hydroxide reacts with the sulfur dioxide in the tail gas by the following reactions:

$$2NaOH + SO_2 \rightarrow Na_2SO_3 + H_2O$$
 (sodium sulfite)

$$Na_2SO_3 + SO_2 + H_2O \rightarrow 2NaHSO_3$$
 (sodium bisulfite)

Or if using soda ash as the alkali:

$$Na_2CO_3$$
 (sodium carbonate/soda ash) +  $2SO_2$  +  $H_2O \rightarrow 2NaHSO_3$  (sodium bisulfite) +  $CO_2$ 

$$Na_2CO_3 + SO_2 \rightarrow Na_2SO_3$$
 (sodium sulfite) +  $CO_2$ 

$$Na_2SO_3 + SO_2 + H_2O \rightarrow 2NaHSO_3$$

A significant amount of SO<sub>2</sub> will be captured in this step. Soda ash or caustic soda is added to the top stage at a rate sufficient to maintain the SO<sub>2</sub> emissions at the required level. Water is added to the top stage circulating system as make up for the water evaporated from the solution by the gas, and to maintain the scrubber bottom stage solution dissolved solids at a value to maintain the salts in solution.

The salt solution is sent to an acidulator located in Regen 2. Sulfuric acid reacts with the salt solution and SO<sub>2</sub> is recovered from the solution. SO<sub>2</sub> is sent back to the gas drying tower to increase sulfuric acid production. SO<sub>2</sub> dissolved in the sodium salt solution is reduced to a minimum level by air stripping.

And the acidulation reaction is:

$$2NaHSO_3 + H_2SO_4 \rightarrow Na_2SO_4 + 2SO_2 + 2H_2O$$

$$Na_2SO_3 + H_2SO_4 \rightarrow Na_2SO_4 + SO_2 + H_2O$$

Remaining gas leaves the scrubber through the attached 130-foot discharge height stack (EPN 104). Emissions include H<sub>2</sub>SO<sub>4</sub> mist not removed by the Brinks unit, SO<sub>2</sub> that was not captured by the scrubber, CO and NO<sub>x</sub> combustion product.

The absorption of SO<sub>3</sub> in the absorbing tower, as well as water in the drying tower, is an exothermic reaction, necessitating cooling of the circulating strong sulfuric acid. State-of-the-art anodically protected stainless steel shell and tube heat exchangers are used for cooling.

#### 6.2 CATALYST SCREENING

Catalyst in converters needs to be screened and cleaned each year. This is a planned MSS activity. Rhodia estimates that the activities can be performed in 218 hours each year. The PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions are routed to a bag filter with an outlet grain loading of less than 0.01 grain/scf.

This section presents the maximum hourly and total annual emission rates of the Sulfuric Acid Regeneration 2 Unit.

#### 7.1 REGEN 2 SULFURIC ACID UNIT

#### 7.1.1 SULFUR DIOXIDE EMISSIONS

The major pollutant from Sulfuric Acid Regeneration Unit No. 2 (EPN 104) is SO<sub>2</sub>. The current stack will be retired after the newly proposed abatement process (wet scrubber) is installed. A new stack will be installed at the wet scrubber. The discussion below reviews the newly proposed abatement process.

With the installation of a wet scrubber, Rhodia has estimated that maximum hourly  $SO_2$  emission from the stack will be 3 lb  $SO_2$ /ton acid produced as a result of variation in production. Through the course of a year, the emission factor for  $SO_2$  is estimated about 1.8 lb  $SO_2$ /ton of acid produced.

Hourly emission of SO<sub>2</sub> is:

$$SO_2 = 3 \frac{lb}{ton} \times 1,150 \frac{ton}{day} \times \frac{1 \, day}{24 \, hr} = 143.75 \frac{lb}{hr}$$

Annual emission of SO<sub>2</sub> is:

$$SO_{2,Annual} = 1.8 \frac{lb}{ton} \times 1,150 \frac{ton}{day} \times \frac{365 day}{year} \times \frac{1 ton}{2,000 lb} = 377.78 \frac{ton}{year}$$

As a result of the abatement, more than 90% of current SO<sub>2</sub> emission will be eliminated. Rhodia will be able to determine annual compliance based on data from the SO<sub>2</sub> CEMS.

#### 7.1.2 H<sub>2</sub>SO<sub>4</sub> EMISSIONS

Some H<sub>2</sub>SO<sub>4</sub> mist can be trapped in the waste stream and emitted from the stack (EPN 104). Since the introduction of the wet scrubber changes the process and due to the increase of production, new test data will be needed to estimate the emission rate of H<sub>2</sub>SO<sub>4</sub>. However, Rhodia conservatively estimates the acid mist emission rate will be 0.10 lb H<sub>2</sub>SO<sub>4</sub>/ton acid produced for annual emission rate. Based on 40 CFR Part 60, Subpart H, the short-term hourly emission rate is 0.15 lb H<sub>2</sub>SO<sub>4</sub>/ton acid produced.

Hourly emission of H<sub>2</sub>SO<sub>4</sub> is:

$$H_2SO_4 = 0.15 \frac{lb}{ton} \times 1,150 \frac{ton}{day} \times \frac{1day}{24hr} = 7.19 \frac{lb}{hr}$$

Annual emission of H<sub>2</sub>SO<sub>4</sub> is:

$$H_2SO_4$$
, Annual =  $0.1 \frac{lb}{ton} \times 1,150 \frac{ton}{day} \times \frac{365 day}{year} \times \frac{ton}{2000 lb} = 20.99 \frac{ton}{year}$ 

#### 7.1.3 NO<sub>x</sub> Emissions

Hourly Emissions of  $NO_x$  are estimated using a concentration value of 96.8 ppmv based on a prior stack test. The maximum design flow rate is 55,145 acfm. A sample calculation for hourly and yearly emission of  $NO_x$  is shown here.

$$NO_{x} = \frac{96.8}{1,000,000} \times \frac{1.0123 atm}{549 \text{R}} \times \frac{55145 \text{ ft}^{3}}{\text{min}} \times \frac{60 \text{min}}{hr} \times \frac{46 lb}{lb mole} \times \frac{lb mole - R}{0.7302 atm - ft^{3}} = 37.20 \frac{lb}{hr}$$

Annual NOx emissions are estimated based on Federal New Source Review applicability analysis (section 8.3) and setting the "projected actual emissions" to be 61.95 tpy.

#### 7.1.4 PM, $PM_{10}$ AND $PM_{2.5}$ EMISSIONS

For this application, Rhodia proposes to use stack tests results from a similar process, which is located in Rhodia Baton Rouge Plant. The Unit 2 at Baton Rouge Plant has an identical acid-making process like the Houston Regen 2. In February 2011, Rhodia performed stack test of PM at Unit 2 using EPA Method 5 and revised Method 202. The production rate of Unit 2 at Baton Rouge was 1,514.9 tons of acid/day (63.12 tons/hour) during the test. The test result is in Table B-1 of Appendix B. A copy of relevant pages from stack test report is also provided in appendix B.

During the test, the maximum short-term PM emission was 5.28 lb/hr, while the average emission rate was 3.75 lb/hr. Considering the difference of production rate between the two plants, a production ratio is used to estimate the emission rates for Houston Plant Regen 2 unit. All PM is assumed to be  $PM_{10}/PM_{2.5}$ .

$$PM, PM_{10/2.5} = \frac{5.28 \text{ lbs}}{\text{hour}} \times \frac{1,150 \text{ tons}}{1,514.9 \text{ tons}} = 4.01 \frac{\text{lb}}{\text{hr}}$$

$$PM, PM_{10/2.5, Annual} = \frac{3.75 \text{ lbs}}{\text{hour}} \times \frac{1,150 \text{ tons}}{1,514.9 \text{ tons}} \times \frac{8,760 hr}{year} \times \frac{ton}{2,000 \text{ lb}} = 12.47 \text{ tpy}$$

#### 7.1.5 VOC AND CO EMISSIONS

There is no change to VOC and CO emission calculations.

#### 7.1.6 GREENHOUSE GAS EMISSIONS

Greenhouse gas (GHG) emissions from Regen 2 are only related to carbon dioxide (CO<sub>2</sub>). There are no other GHG gases. Stack test for Regen 2 was performed in October 2010. The results are in Table

B-2 of Appendix B. A copy of relevant pages from stack test report is also provided in appendix B. The average CO<sub>2</sub> concentration was 8% by volume. The average exhaust flow rate was 53,295 acfm. The current design production rate is 969 tons of acid/day. To be conservative and be consistent with other calculations, the flow rate is adjusted to 55,145 acfm, and 549 R is used for the temperature. For short-term emission rate, the CO<sub>2</sub> concentration is assumed at 10% by volume. For long-term emission rate, the average concentration of 8% is used. A ratio of proposed production rate to current production rate (1,150/969) is applied to the estimation.

$$\begin{split} CO_2 &= 10\% \times 1.0123 atm \times \frac{55{,}145\,ft^3}{\min} \times \frac{60\,\min}{hr} \times \frac{44lb}{lbmole} \times \frac{1}{549R} \times \frac{lbmole - R}{0.73024 atm - ft^3} \times \frac{1150}{969} = 43{,}627\frac{\text{lb}}{\text{hr}} \\ CO_{2,\,Annual} &= 43{,}627\frac{lb}{hr} \times \frac{8\%}{10\%} \times \frac{8760\,hr}{year} \times \frac{ton}{2{,}000lb} = 152{,}869\,\text{tpy} \end{split}$$

#### 7.1.7 HCL AND CL<sub>2</sub> EMISSIONS

Emissions of HCl and Cl<sub>2</sub> are based on the feed rate of chlorinated materials from hazardous waste permit HW50095. The new feed rate established for permit HW50095 is 503 lb as Chlorine per hour. The HCl removal efficiency is 99.969% for the unit. Trial burn conducted before found that Cl<sub>2</sub> to HCl ratio is 1 lb/Cl<sub>2</sub> to 14.706 lbs of HCl.

$$\begin{split} HCl &= \frac{503 \text{ lbs}}{\text{hour}} \times (1 - 99.969 \%) \times \frac{36.5}{35.5} = 0.16 \frac{\text{lb}}{\text{hr}} \\ HCl_{Annual} &= \frac{0.161 \text{lb}}{\text{hour}} \times \frac{8760 hr}{year} \times \frac{ton}{2000 lb} = 0.7 tpy \\ Cl_2 &= 0.16 \frac{\text{lb}}{\text{hr}} \times \frac{1}{14.706} = 0.011 \frac{lb}{hr} \\ Cl_{2,Annual} &= \frac{0.0111 \text{lb}}{\text{hour}} \times \frac{8760 hr}{year} \times \frac{ton}{2000 lb} = 0.048 tpy \end{split}$$

A summary of emission rates from the Regen 2 unit is provided in the table below.

Table 7-1. Proposed Emission Rates from Unit No. 2 Stack (EPN 104)

Pollutant	lb/hr	tpy
NO <sub>x</sub>	37.20	61.95
СО	5.70	25.00
SO <sub>2</sub>	143.75	377.78
H <sub>2</sub> SO <sub>4</sub>	7.19	20.99
PM	4.01	12.47
PM <sub>10</sub>	4.01	12.47
PM <sub>2.5</sub>	4.01	12.47
HCI	0.16	0.70
Cl <sub>2</sub>	0.011	0.048
CO <sub>2</sub> -e	43,627	152,869
VOC	0.01	10.0

#### 7.2 CATALYST SCREENING

Catalyst in the converter needs to be replaced and screened each year. The estimated schedule is 218 hours per year. The PM emissions are estimated using the total volume of the material, the density of the material, the amount that is airborne, and the control efficiency of the bag filter. All PM emissions are assumed to be  $PM_{10}$  / $PM_{2.5}$ .

$$PM, PM_{10/2.5} = \frac{200,000 \text{ lit}}{\text{year}} \times \frac{1 y e a r}{218 h r} \times \frac{1 m^3}{1,000 lit} \times \frac{650 kg}{m^3} \times \frac{2.205 \text{ lb}}{\text{kg}} \times 0.05\% \times (1-99\%) = 6.57 \times 10^{-3} \frac{\text{lb}}{\text{hr}}$$

$$PM, PM_{10/2.5, Annual} = 6.57 \times 10^{-3} \frac{\text{lb}}{\text{hr}} \times \frac{218hr}{year} \times \frac{ton}{2,000lb} = 7.17 \times 10^{-4} tpy$$

Table 7-2 Emission Rates from Catalyst Screening (EPN CATSCNR2)

Pollutant	lb/hr	tpy
PM	$6.57 \times 10^{-3}$	7.17 x 10 <sup>-4</sup>
PM <sub>10</sub>	6.57 x 10 <sup>-3</sup>	7.17 x 10
PM <sub>2.5</sub>	6.57 x 10 <sup>-3</sup>	7.17 x 10

Rhodia Houston Plant is located in Harris County. This is an area of severe ozone nonattainment. The Houston Plant is an existing major stationary source. According to 30 TAC §116.150 and §116.160, this site needs to evaluate both nonattainment (NA) and prevention of significant deterioration (PSD) applicability.

#### 8.1 PROJECT SCOPE

The project plans to have a production rate increase for Regen 2. It will also install a caustic scrubber (EPN 104) for  $SO_2$  reduction in Regen 2 and increase the feed to the furnace. However, the spent acid tanks, vapor combustors, preheater, and fugitive areas associated with these facilities will not be affected by this project.

#### 8.2 PSD APPLICABILITY

Based on 30 TAC §116.160(b), the netting is required unless the proposed emissions increases associated with a project, without regard to decreases, are less than major modification thresholds for the pollutant identified in 40 Code of Federal Regulations (CFR) §52.21(b)(23).

The first step in the PSD analysis is to determine if the project increase (proposed allowable emissions – baseline actual emissions) is less than the significant emissions rate (SER). This analysis is shown in table below for each criteria pollutant subject to PSD regulations.

Table 8-1 Project Increase for PSD Applicability

Pollutant	Proposed Allowable, tpy	Baseline Actual, tpy	Increase, tpy	SER, tpy	Netting?
SO <sub>2</sub>	377.78	4007.6	0	40	NO
CO	25	0	25	100	NO
PM	12.47	6.5	5.97	25	NO
PM <sub>10</sub>	12.47	6.5	5.97	15	NO
PM <sub>2.5</sub>	12.47	6.5	5.97	10	NO
H <sub>2</sub> SO <sub>4</sub>	20.99	10.94	10.05	7	YES
CO2-e	152,869.03	79,671.80	73,197.22	75,000	NO

Since the allowable emissions for CO is less than the SER, the baseline for CO is assumed to be zero. For all other pollutants, the baseline calculation based on any consecutive 24-months in the past 10 years can be found in Appendix C of this application.

As shown in Table 8-1, project increases for CO, PM, PM<sub>10</sub>, PM<sub>2.5</sub> and GHG do not exceed the SER. For SO<sub>2</sub>, there is a net reduction of annual SO<sub>2</sub> emissions. As a result, these pollutants do not trigger PSD review.

For H<sub>2</sub>SO<sub>4</sub>, the project increase exceeds its corresponding SER. The next step should be using the netting and evaluate all creditable emission increases and decreases during the contemporaneous period for this pollutant to observe if the site can "net out" of PSD. However, since the EPN 104 stack contributes to a significant portion of the site-wide emissions, and there is no known significant decrease of emissions from the site during the contemporaneous period for this amendment application.

#### 8.3 NA APPLICABILITY

Since the site is in a severe ozone nonattainment area and is major, there are two steps for NA analysis based on 30 TAC §116.150.

The first step is to see if the project increase, without considering decrease, is less than 5 tpy of each nonattainment pollutant in this area. For ozone, the pollutants are VOC and  $NO_x$ .

Table 8-2 Project Increase for NA Applicability

Pollutant	Proposed Allowable, tpy	Baseline Actual, tpy	Increase, tpy	Limit, tpy	Netting?
NO <sub>x</sub>	61.95	57.02	4.92	5	NO
VOC	0.01	0	0.01	5	NO

Rhodia does not intend to change the allowable VOC rate from current value (0.01 tpy). Since VOC allowable emissions are less the NA trigger of 5 tpy, the baseline for VOC is assumed to be zero. Therefore, VOC passes the test and no NA review is required.

For  $NO_{\infty}$  Rhodia is electing to limit the "Projected Actual Emissions" to 61.95 tpy from EPN 104 in order to stay below 5 tpy and avoid contemporaneous netting (and potential Non attainment NSR). Details of baseline calculation and project increase can be found in Appendix C.

As discussed in Section 1, to address the issue of reconciling PM<sub>10</sub>/PM<sub>2.5</sub> emissions in the permit baseline (related to the Federal New Source Review), the TCEQ has requested a retrospective project increase analysis for all permit actions (amendment or renewal) pertinent to PSD review since the effective date of PSD rules (NSR August 1977). This section addresses this topic. All permit applications are listed in a chronological order beginning with the latest change (December 3, 2010) to the oldest permit application right before August 1977. This does not take into any of the PBRs and standard permits that the site may have historically utilized.

### 1. TCEQ Received Date December 3, 2010, Issuance Date February 8, 2011, TCEQ Project No. 161773

#### **Project Description**

A vessel attached to the Brinks mist eliminator is found to have some mechanical defects due to wear and tear. Rhodia decided to replace the vessel with an identical one to ensure safe operation. Since this was a replacement in kind, there were no emission rates changes.

#### **Project Increase**

Per the application representation, the replacement of the vessel was deemed a routine maintenance activity. According to 30 TAC §116.12 (18)(B)(i), this replacement was not a "physical change or change in the method of operation". Therefore, the project increase was zero. This permit amendment did not trigger PSD review.

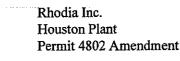
#### TCEQ Received Date March 29, 2010, Issuance Date August 20, 2010, TCEQ Project No. 156557

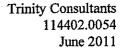
#### **Project Description**

Due to operational and safety concerns, Rhodia decided to take voluntary actions to reduce the short-term (lbs/hr) VOC emissions from vapor combustor EPN 170. Rhodia also wanted to seek authorization of a caustic scrubber (EPN 122) during periods of startup of EPN 170.

#### **Project Increase**

The caustic scrubber (EPN 122) and vapor combustor 2 (EPN 170) were affected by this amendment. Table 9-1 shows the allowable emission rates (tons/year) that were authorized in the final MAER table dated August 20, 2010. In order to simplify the analysis, baseline emissions for all pollutants are assumed to be zero. The allowable emission rates are directly compared to the threshold limits. As shown in Table 9-2, none of the pollutants had a project increase greater than the threshold limit. Therefore, this permit amendment did not trigger PSD or NA review. Since the vapor combustor was operated and designed like a flare, there were no visible emissions. Hence, there were no PM emissions.





**Table 9-1 Annual Emission Rates** 

EPN	Description	Pollutant	tpy
122	Caustic Scrubber	SO <sub>2</sub>	0.01
	(EPN 170 Startup)	VOC	2.02
170	Vapor Combustor 2	CO	0.3
	(Normal Operation)	NO <sub>x</sub>	0.15
		SO <sub>2</sub>	0.01
		VOC	0.01
170	Vapor Combustor 2	CO	4.85
	(Furnace MSS)	NO <sub>x</sub>	0.57
		SO <sub>2</sub>	0.13
		VOC	0.86
		HCl	0.13
		Cl <sub>2</sub>	0.03
170	Vapor Combustor 2	CO	1.48
	(Storage Tanks Planned	NO <sub>x</sub>	0.17
	Inspection Purge	SO <sub>2</sub>	0.01
	Control Option One)	VOC	0.01

Table 9-2 Project Increase for PSD and NA Review

Pollutant	Baseline, tpy	Increase, tpy	Threshold*, tpy	Increase < Threshold?
со	0	6.63	100	YES
NO <sub>x</sub>	0	0.89	5	YES
SO <sub>2</sub>	0	0.16	40	YES
VOC	0	2.9	5	YES

<sup>\*</sup>For  $NO_x$  and VOC, threshold limits are based on 30 TAC §116.150 for nonattainment area. The threshold limits for other pollutants are based on 40 CFR §52.21(b)(23).

### 3. TCEQ Received Date January 2, 2008, Issuance Date December 29, 2008, TCEQ Project No. 135428

#### **Project Description**

- A Added planned MSS for hazardous waste tanks (B1, B2, F2, F3, H1 and H2) and Tank T554 cleaning and degassing
- B Replaced the first electrostatic precipitator (ESP) in REGEN2 and refurbished the second ESP in REGEN2

#### **Project Increase**

The only project increases were VOC emissions from the two new EPNs for tank MSS. Two new emission points were added (MSS-HAZTK1 and MSS-HAZTK2) for tank MSS activity. There were no PM emissions from the affected equipment.

Table 9-3 Project Increase for NA Review

EPN	Description	Pollutant	Proposed rate, tpy	Baseline, tpy	Threshold, tpy	Increase < Threshold?
MSS- HAZTK1	Hazardous Waste Tanks (F2, F3) and T554, Planned MSS Purge	VOC	0.01	0	5	
MSS- HAZTK2	Hazardous Waste Tanks (B1, B2, H1 and H2), Planned MSS Purge	VOC	0.01	0	5	
Total		VOC	0.02	0	5	YES

As shown in Table 9-3, the project increase of 0.02 tpy was less than the threshold limit (5 tpy) for NA review. Therefore, this project did not trigger NA review. Since there were no PSD pollutants associated with this project, it didn't trigger PSD review either.

### 4. TCEQ Received Date December 27, 2006, Issuance Date April 5, 2007, TCEQ Project No. 126531

#### **Project Description**

- A Installed a new spent sulfuric acid tank (Tank No. 53)
- B Added new fittings (flanges and valves) associated with the installation of the new tank
- C Modified Special Condition 3 in current permit to increase hazardous waste tank truck depressurizations to 10 trucks/day for 1314 hours/year (550 trucks/year)
- D Increased the spent acid tank turnovers among Tanks 48, 49, 56 and 78 and include new Tank 53 turnovers
- E Added a new EPN for emissions due to tank MSS
- F Changed and added special conditions for hydrocarbon monitors
- G Added new chemicals to the "Approved Chemical List for Hazardous Waste Operations"

#### **Project Increase**

Only Items A to E need to be evaluated for project increase. Since the input to the acid-making process was changed, Unit No. 2 Stack (EPN 104) was affected by this project. Other affected EPNs were vapor combustor (EPN 120), vapor combustor 2 (EPN 170), TKINSPMSS1, TKINSPMSS2, and FUG-SA1.

For EPN 104, emissions increases caused by adding Tank 53 and increased turnovers are used as baseline. In order to simplify the analysis, baseline emissions for other EPNs are assumed to be zero, and the allowable rates are directly compared to the threshold limits. As shown in Table 9-5, none of the pollutants has a project increase greater than the threshold limit. Therefore, this permit amendment did not trigger PSD or NA review.

**Table 9-4 Annual Emission Rates** 

EPN	Table 9-4 Annual Emiss  Description	Pollutant	tpy
104	Regen No. 2 Stack	NO <sub>x</sub>	0.350
	8	co	0.054
		SO <sub>2</sub>	11.75
		H <sub>2</sub> SO <sub>4</sub>	0.057
		PM/PM <sub>10</sub> /PM <sub>2,5</sub>	0.032
120	Vapor Combustor	Cl <sub>2</sub>	0.09
	(Startup, Shutdown, and	CO	0.27
	Maintenance 1,314 hours	HCI	0.04
	per rolling 12 months)	$NO_x$	0.32
		PM <sub>10</sub>	0.02
		$SO_2$	0.01
		VOC	3.41
170	Vapor Combustor 2	СО	0.093
	(Start-up, Shutdown and	$Cl_2$	0.03
	Maintenance 1,314 hours	HCl	0.12
	per rolling 12 months)	NO <sub>x</sub>	0.011
	3	PM <sub>10</sub>	0.05
		SO <sub>2</sub>	0.028
		VOC	0.006
170	Vapor Combustor 2	СО	0.51
	Storage tanks	$NO_x$	0.32
	Inspection control option	$SO_2$	0.01
	one	VOC	0.02
TKINSPMSS1	Tank 78 Planned MSS	CO	0.75
	·	$NO_x$	0.35
<b>*</b>		$SO_2$	0.09
		VOC	0.07
TKINSPMSS2	Tank 48, 49, 53, and 56	СО	0.4
	Planned MSS	$NO_x$	0.19
		$SO_2$	0.01
		VOC	0.02
FUG-SA1	Spent acid process fugitive	H <sub>2</sub> SO <sub>4</sub>	1.79
		SO <sub>2</sub>	0.37
		VOC	0.35

<sup>\*</sup>For EPN 104,  $PM/PM_{10}/PM_{2.5}$  emissions were never authorized in the MAERT for this amendment. They are added here for retrospective PSD analysis.

Table 9-5 Project Increase for PSD and NA Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?
CO	2.08	0	100	YES
NO <sub>x</sub>	1.54	0	5	YES
SO <sub>2</sub>	12.27	0	40	YES
VOC	3.88	0	5	YES
H₂SO₄	1.85	0	7	YES
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.032	0	25/15/10	YES

<sup>\*</sup>For NO<sub>x</sub> and VOC, threshold limits are based on 30 TAC §116.150 for nonattainment area. The threshold limits for other pollutants are based on 40 CFR §52.21(b)(23).

### 5. TCEQ Received Date October 18, 2006, Issuance Date February 20, 2007, TCEQ Project No. 125360

#### **Project Description**

- A Installed a new acidulator
- B Authorized fugitive emissions associated with this new acidulator

#### **Project Increase**

Since the installation of the acidulator did not alter the parameters (e.g., production rate) for the acid-making process, it did not qualify for a physical change or change of method of operation for the acid-making process according to 30 TAC §116.12 (18)(A). Therefore, the acid-making process was not affected and associated Unit No. 2 Stack (EPN 104) was not modified. Also, there were no PM emissions associated with this EPN. The only project increase came from the fugitive emissions (EPN FE2) related to the components for the acidulator. Table 9-6 shows the analysis for FE2. To simplify the process, the baseline is assumed to be zero.

Table 9-6 Project Increase for PSD Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold, tpy	Increase < Threshold?
SO <sub>2</sub>	0.2	0	40	YES

As shown above, SO<sub>2</sub> did not have a project increase greater than the threshold limit. Therefore, this permit amendment did not trigger PSD review.

### 6. TCEQ Received Date February 7, 2006, Issuance Date April 5, 2006, TCEQ Project No. 120879

#### **Project Description**

Tank 78 used to send vent stream to caustic scrubber followed by vapor combustor (EPN 170). In this amendment, Rhodia rerouted the Tank 78 emission to furnace if the furnace operated normally.

#### **Project Increase**

Rerouting of Tank 78 emissions to the furnace affected the acid-making process. Therefore, the acid-making process was affected and associated Unit No. 2 Stack (EPN 104) was modified. The other affected facility was the vapor combustor 2 (EPN 170) for its normal and furnace MSS activities. For EPN 104, emission increases caused by rerouting Tank 78 emissions were used as baseline. To simplify the process, the baseline is assumed to be zero for EPN 170.

**Table 9-7 Annual Emission Rates** 

EPN	Description	Pollutant	tpy
104*	Regen No. 2 Stack	NO <sub>x</sub>	0.18
		со	0.028
		SO <sub>2</sub>	6.12
		H <sub>2</sub> SO <sub>4</sub>	0.030
		PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.017
170	Vapor Combustor 2	CO	0.56
	(Start-up, Shutdown and	Cl <sub>2</sub>	0.03
	Maintenance 1,314 hours	HCl	0.12
	per rolling 12 months)	NO <sub>x</sub>	1.87
		PM <sub>10</sub>	0.05
		SO <sub>2</sub>	0.11
		VOC	0.69
170	Vapor Combustor 2	СО	1.87
	(Normal Operation)	$NO_x$	1.4
		$PM_{10}$	0.07
		$SO_2$	0.01
		VOC	0.05

<sup>\*</sup>For EPN 104, PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions were never authorized in the MAERT for this amendment. They are added here for retrospective PSD analysis.

Table 9-8 Project Increase for PSD and NA Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?
CO	2.46	0	100	YES
$NO_x$	3.45	0	5	YES
SO <sub>2</sub>	6.24	0	40	YES
VOC	0.74	0	5	YES
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.137	0	25/15/10	YES

<sup>\*</sup>For  $NO_x$  and VOC, threshold limits are based on 30 TAC §116.150 for nonattainment area. The threshold limits for other pollutants are based on 40 CFR §52.21(b)(23).

As shown above, project increase for each pollutant does not exceed its corresponding threshold limit. Therefore, this amendment did not trigger PSD or NA review.

# 7. TCEQ Received Date January 3, 2005, Issuance Date August 24, 2005, TCEQ Project No. 112876

**Project Description** 

- A Authorized pollutants (HCl, Cl<sub>2</sub> and CO) that were never permitted for Regen No. 2 Stack (EPN 104).
- B Reconciled H<sub>2</sub>SO<sub>4</sub> for Regen No. 2 Stack (EPN 104). This lowered the emission in permit.
- C Authorized pollutants (Cl<sub>2</sub>, CO, HCl, NO<sub>x</sub>, PM<sub>10</sub> and SO<sub>2</sub>) that were never permitted during MSS for vapor combustor (EPN 120).

**Project Increase** 

The only affected facilities that this amendment application were related to were EPN 104 and 120. Since no physical change was involved, pollutants that were already authorized do not need to be considered as project increases unless the rates were changed. Therefore, no projects were authorized as part of this amendment. Hence, no FNSR applicability.

Table 9-9 Annual Emission Rates

EPN	Description	Pollutant	tpy	
104	Regen No. 2 Stack	CO	25	
		Cl <sub>2</sub>	0.08	
		H <sub>2</sub> SO <sub>4</sub>	22.67	
		HCl	1.23	
120	Vapor Combustor	Cl <sub>2</sub>	0.09	
	(Startup, Shutdown, and	со	0.27	
<del>"</del>	Maintenance 1,314 hours	HCl	0.04	
	per rolling 12 months)	NO <sub>x</sub>	0.32	
		$PM_{10}$	0.02	
		SO <sub>2</sub>	0.01	

# 8. TCEQ Received Date September 4, 2003, Issuance Date October 21, 2004, TCEQ Project No. 100817

**Project Description** 

- A Authorized new vapor combustor (EPN 120) to control vent streams from hazardous waste tanks if the furnace is down.
- B Authorized new vapor combustor 2 (EPN 170) to control vent streams from spent acid tanks if the furnace is down.
- C Authorized VOC emissions from Unit No. 2 Stack (EPN 104).
- D Included fugitive emissions (FE-12 to FE-14 and FUG-SA1 to FUG-SA4).

**Project Increase** 

The additions of EPN 120 and EPN 170 were independent projects by themselves. The authorization of VOC from EPN 104 and addition of fugitive sources can be treated as one project. Since EPN 120, EPN 170 and fugitives were newly added, their baselines are zero. VOC from EPN 104 was not authorized before, its baseline is also zero.

**Table 9-10 Annual Emission Rates** 

	Table 9-10 Annual Emis		
EPN	Description	Pollutant	tpy
120	Vapor Combustor	СО	3.33
	Standby	NO <sub>x</sub>	3.96
		PM <sub>10</sub>	0.3
		SO <sub>2</sub>	0.02
		VOC	0.22
120	Vapor Combustor (maintenance)	VOC	3.29
170	Vapor Combustor 2	CO	1.87
	Normal	NO <sub>x</sub>	1.4
		$PM_{10}$	0.07
		SO <sub>2</sub>	0.52
		VOC	3.3
170	Vapor Combustor 2	SO <sub>2</sub>	0.02
	(maintenance)	VOC	0.14
104	Unit No.2 Stack	VOC	0.01
FE-12	Fugitives from HW Equipment	VOC	0.19
FE-13	Fugitives from HW Equipment	VOC	0.1
FE-14	Fugitives from HW Equipment	VOC	0.01
FUG-SA1	Spent Acid Process Fugitives	VOC	0.27
		SO <sub>2</sub>	0.31
		H₂SO <sub>4</sub>	1.33
FUG-SA2	Spent Acid Process Fugitives	VOC	0.06
		$SO_2$	0.08
		H <sub>2</sub> SO <sub>4</sub>	0.27
FUG-SA3	Spent Acid Process Fugitives	VOC	0.07
1000110		SO <sub>2</sub>	0.18
		H <sub>2</sub> SO <sub>4</sub>	0.11
FUG-SA4	Spent Acid Process Fugitives	VOC	0.29
100 5111		SO <sub>2</sub>	0.37
		H <sub>2</sub> SO <sub>4</sub>	1.33

Table 9-11 Project Increase from EPN 120 for PSD and NA Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?
СО	3.33	0	100	YES
NO <sub>x</sub>	3.96	0	5	YES
PM <sub>10</sub>	0.3	0	15	YES
SO <sub>2</sub>	0.02	0	40	YES
VOC	3.51	0	5	YES

Table 9-12 Project Increase from EPN 170 for PSD and NA Review

-	12010 > 12 1103001 1101011				
Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?	
СО	1.87	0	100	YES	
NO <sub>x</sub>	1.4	0	5	YES	
PM <sub>10</sub>	0.07	0	15	YES	
SO <sub>2</sub>	0.54	0	40	YES	
VOC	3,44	0	5	YES	

Table 9-13 Project Increase from EPN 104 and Fugitives for PSD and NA Review

Pollutant	Proposed, tpy	Baseline, tpy	Threshold*, tpy	Increase < Threshold?
VOC	1.0	0	5	YES
SO <sub>2</sub>	0.94	0	40	YES
H <sub>2</sub> SO <sub>4</sub>	3.04	0	7	YES

<sup>\*</sup>For  $NO_x$  and VOC, threshold limits are based on 30 TAC §116.150 for nonattainment area. The threshold limits for other pollutants are based on 40 CFR §52.21(b)(23).

As shown above, project increase for each pollutant does not exceed its corresponding threshold limit. Therefore, this amendment did not trigger PSD or NA review.

# 9. TCEQ Received Date September 1, 1994, Issuance Date June 28, 1995, TCEQ Project No. 30032

## **Project Description**

There were no projects authorized in this renewal.

#### **Project Increase**

This is not applicable.

# 10. TCEQ Received Date April 27, 1993, Possible Issuance Date November 4, 1993, TCEQ Project No. 21867

# **Project Description**

This was to incorporate three special conditions previously contained in Permit No. 4802A into Permit 4802. The Permit No. 4802A was voided.

**Project Increase** 

No project increase due to the incorporation of Permit No. 4802A.

# 11. TCEQ Received Date unknown, Issuance Date April 22, 1985, TCEQ Project No. unknown

**Project Description** 

Fugitive emissions (SO<sub>3</sub>) associated with oleum unit was authorized.

**Project Increase** 

The only project increase was SO<sub>3</sub>. The permit condition was 0.1 lb of SO<sub>3</sub>/day. This is equivalent to 0.02 tpy. Apparently, this did not trigger any PSD review.

# 12. TCEQ Received Date unknown, Possible Issuance Date July 1977, TCEQ Project No. unknown

**Project Description** 

New furnace, new waste heat boiler, new converter, new "C" heat exchanger, oleum tower were added as a modernization project. The production rate was increased from 600 to 740 tons of acid/day. Meanwhile, Unit No. 1 was shutdown.

**Project Increase** 

According to a letter dated September 23,1976 from Rhodia (Stuaffer Chemical Company at that time) to Mr. Bennett Stokes at EPA Region VI, this change did not qualify for modification. An excerpt of the letter is cited below:

This planned modernization of Unit No. 2 will return its capacity to 740 tons per day  $H_2SO_4$  and its mass emission rate will be increased to 18 tons per day of SO2. Although resulting in increased emissions from this Unit, it is Stuaffer's position that the planned changes to Unit No. 2 will not qualify it as a modification as defined in the EPA new source regulations because of the application of 40 CFR 60.14(d) – "the bubble concept". This section of the new source regulations applies to this situation since Unit No. 1, which now emits 3.5 tons per day of SO<sub>2</sub>, is being shutdown while Unit No. 2 emissions will increase by only 3 tons per day; an amount which is less than the present emissions of the Unit to be shutdown.

Therefore, there was no project increase. This project did not trigger PSD or NA review.

Summary

Since the historical FNSR analysis conducted as part of this amendment application did not trigger any of the PSD or NANSR. As a result, this site should be able to utilize a baseline for PM<sub>10</sub>/PM<sub>2.5</sub> emissions for both NSR applicability analysis and impact review (dispersion modeling analysis).

To meet the requirements of Title 30 TAC §116.141, a Certificate of Estimated Capital Cost and Fee Verification (Table 30) is included with this permit amendment application. Because this project has an estimated capital cost of \$5,000,000, and is subjected to PSD review, Rhodia will submit the permit application fee of \$50,000.



# Texas Commission on Environmental Quality Table 30 Estimated Capital Cost and Fee Verification

Include estimated cost of the equipment and services that would normally be capitalized according to standard and generally accepted corporate financing and accounting procedures. Tables, checklists, and guidance documents pertaining to air quality permits are available from the Texas Commission on Environmental Quality, Air Permits Division Web site at <a href="https://www.tceq.state.tx.us/nav/permits/air\_permits.html">www.tceq.state.tx.us/nav/permits/air\_permits.html</a>.

, DII	RECT COSTS [30 TAC § 116.141(c)(1)]	Estimated Capital Cost
A.	A process and control equipment not previously owned by the applicant and not currently authorized under this chapter	\$ 300,000
В.	Auxiliary equipment, including exhaust hoods, ducting, fans, pumps, piping, conveyors, stacks, storage tanks, waste disposal facilities, and air pollution control equipment specifically needed to meet permit and regulation requirements	\$ 1,750,000
C.	Freight charges	\$ 50,000
D.	Site preparation, including demolition, construction of fences, outdoor lighting, road and parking areas	\$ 200,000
E.	Installation, including foundations, erection of supporting structures, enclosures or weather protection, insulation and painting, utilities and connections, process integration, and process control equipment	\$ 1,000,000
F.	Auxiliary buildings, including materials storage, employee facilities, and changes to existing structures	\$0
G.	Ambient air monitoring network	\$0
I. INI	DIRECT COSTS [30 TAC § 116.141(c)(2)]	Estimated Capital Cost
Α.	Final engineering design and supervision, and administrative overhead	\$ 1,200,000
B.	Construction expense, including construction liaison, securing local building permits, insurance, temporary construction facilities, and construction clean-up	\$ 500,000
C.	Contractor's fee and overhead	\$
TOTAI	L ESTIMATED CAPITAL COST	\$ 5,000,000

I certify that the total estimated capital cost of the project as defined in 30 TAC § 116.141 is equal to or less than the above figure. I further state that I have read and understand Texas Water Code § 7.179, which defines <u>CRIMINAL OFFENSES</u> for certain violations, including intentionally or knowingly making, or causing to be made, false material statements or representations.

Company Nam	e: Rhodia Inc		
	•	William McConnell_Title: Plant Manag	ger
Esti	mated Capital Cost	Permit Application Fee	PSD/Nonattainment Application Fee
Less than \$300,000 to \$300,000 to	\$300,000 \$25,000,000 \$7,500,000	\$900 (minimum fee) 0.30% of capital cost	\$3,000 (minimum fee) \$50,000.00 1.0% of capital cost
Greater than Greater than	\$25,000,000 \$7,500,000	\$75,000 (maximum fee)	\$75,000 (maximum fee)

PERMIT APPLICATION FEE (from table above) = \$50,000.00 \_\_\_\_\_ Date: \(\frac{5/24/2011}{2011}\)

Per 30 TAC 116.110(f), applications with a project capital cost greater than \$2,000,000 must be submitted under seal of a Texas licensed professional engineer. Therefore, Rhodia is submitting this application under the seal of Wei Liu, P.E.

# PROFESSIONAL ENGINEER CERTIFICATION

Based on the information provided by Rhodia, Inc., I directly supervised the engineering work products contained in the Emission Calculation (Section 7 and Appendix A) and the Best Available Control Technology (Section 12).

To the best of my knowledge, the representations made in this document are true and accurate. By affixing my seal below, I submit that the engineering work and calculations performed in the above listed sections were either performed by myself or under my direct supervision, as defined in Section 131.18 of the Texas Engineering Practice Act and in compliance with Title 30 of the Texas Administrative Code, Chapter 116, Section 116.110(f).

ar Lin

Signature

May 27, 2011

Date

Wei liu, Ph.D.

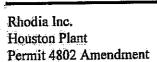
Sr. Consultant

Trinity Consultants, Firm No. 5764

Name

Title

Affiliation



# 11. MATERIAL BALANCE

TABLE 2 MATERIAL BALANCE

#### TABLE 2

# **MATERIAL BALANCE**

This material balance table is used to quantify possible emissions of air contaminants and special emphasis should be placed on potential air contaminants, for example: If feed contains sulfur, show distribution to all products. Please relate each material (or group of materials) listed to its respective location in the process flow diagram by assigning point numbers (taken from the flow diagram) to each material.

LIST EVERY MATERIAL INVOLVED IN EACH OF THE FOLLOWING GROUPS	Point No. from Flow Diagram	Process Rate (lbs/hr or SCFM) standard conditions: 70 F 14.7 PSIA. Check appropriate column at right for each process.	Measurement	Estimation	Calculation
Raw Materials - Input     Spent Acid     Hazardous Waste     Sulfur		57,300,000 gallons/year 6,202,000 gallons/year 13,140,000 gallons/year		X X X	
2. Fuels – Input Natural Gas	Preheater EPN 120 EPN 170	Maximum 810 SCFM for all three		Х	
Products & By-Products - Output H2SO4		95833.3 lbs/hr (1,150 tons/day)		х	
4. Solid Wastes - Output					
5. Liquid Wastes - Output					
6. Airborne Waste (Solid) – Output		See Table 1(a)			
7. Airborne Wastes (Gaseous) – Output		See Table 1(a)			
7. Airborne Wastes (Gaseous) – Output		See Table 1(a)			

Best available control technology (BACT) requirements must be met for all new or modified sources in the permit application. Based on 30 TAC §116.111, Rhodia must demonstrate that the equipment will utilize BACT, with consideration given to the technical practicability and economic reasonableness of reducing or eliminating the emissions from the equipment. While the Catalyst Screening and Wet Scrubber (Sections 12.1and 12.2) conform to State BACT, the Mist Eliminator will need to meet the Federal BACT analysis as demonstrated in Section 12.3.

## 12.1 CATALYST SCREENING

The catalyst screening is controlled by a bag filter. The bag filter has an outlet particulate loading of 0.01 grain/scf. This meets the current state BACT requirements.

#### 12.2 WET SCRUBBER

The SO<sub>2</sub> laden gas leaving the sulfuric acid plant absorption tower will be removed by sodium salt scrubbing in the newly proposed two-stage wet scrubber. Rhodia currently has mist eliminators at the outlet of Regen 2 process and will continue to utilize mist eliminators to minimize sulfuric acid mist emissions after the new scrubber is installed. The scrubber achieves an SO<sub>2</sub> removal efficiency of at least 95%.

The system is designed to remove sufficient sulfur dioxide from the sulfuric acid plant tail gas to meet sulfuric acid plant emission regulations. The unit is highly flexible and permits control of  $SO_2$  to meet emissions requirements even during a cold start-up or upset. Rhodia currently has an  $SO_2$  continuous emission monitoring system (CEMS) on the Unit No. 2 Stack, and there will be a  $SO_2$  CEMS on the outlet of the scrubber to ensure compliance.

Installation of spare circulation pump ensures 100% on-stream time. The system operation parameters are monitored to meet the reliability and flexibility requirements by the TCEQ.

In addition, Title 40 Code of Federal Regulations Part 60, Subpart H (Standards of Performance for Sulfuric Acid Plants), §60.82 requires that no owner or operator subject to the provisions of the subpart shall cause to be discharged into the atmosphere from any affected facility any gases which contain sulfur dioxide in excess of 2 kg per metric ton of acid produced (4 lb per ton). Rhodia will emit 1.8 lb SO<sub>2</sub>/ton acid produced on an annual basis. The emission rate from the new scrubber will meet and exceed the NSPS requirements.

# 12.3 PSD BACT FOR MIST ELIMINATOR (SULFURIC ACID)

Since acid mist triggers the PSD review, the Mist Eliminator has to conform to the Federal BACT provisions as codified in TCEQ chapter 116. Sulfuric acid triggers PSD review for this application. Therefore, the BACT analysis for sulfuric acid should follow the top-down EPA 5-step approach.

A search of BACT for sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) control was performed from TCEQ guidance documents and EPA's RACT/BACT/LAER Clearinghouse (RBLC) for the last 10 years (May 2001 to May 2011).

# Step 1 Available BACT Technologies

The RBLC results are summarized in Appendix D for the sulfuric acid industry (RBLC process ID 62.015). As it shows, the BACT for H<sub>2</sub>SO<sub>4</sub> control includes mist eliminators (also known as candles or filter media), wet electrostatic precipitators, condensers and wet scrubbers.

# Step 2 Elimination of Technically Infeasible Options

All techniques are technically feasible.

# Step 3 Rank Remaining Control Technologies by Effectiveness

All control technologies are ranked from the most efficient to the least efficient order.

Table 12-1 Rank of Control by Effectiveness

Rank	Description	Efficiency, %
1	Brink mist eliminators	99.9%
2	mist eliminators, filter media	99%
3	Wet ESP, condensers, wet scrubbers	unknown

### Step 4 Evaluation of Most Effective Control

Apparently, the most efficient control will be the Brink mist eliminators. Mist eliminators or filter media are just different names for the mist eliminators. Most of them can achieve 99% control efficiency.

#### Step 5 Selection of BACT

Rhodia has the Brink mist eliminator in place.

All mist eliminators are using filter media to capture acid mists. The major differences are different materials and equipment configuration. The emission rate of acid mist ranges from 0.1 lb/ton acid produced to 0.15 lb/ton acid produced. Most of the applications utilized BACT-PSD analysis. Comparing to different mist eliminators, Rhodia's Brink eliminator is one of the devices with high efficiency.

Rhodia currently has a Type HE (high efficiency) fiberglass mist eliminator as an add-on device for acid mist control. Based on Brownian diffusion mechanism, droplets of sulfuric acid mist are trapped in fine collecting fibers and coarse re-entrainment fibers. The filter media is engineered chemical-resistant fiber. Therefore, it can provide durability for the mist eliminator. Test results showed that this mist eliminator has at least 99.9% removal efficiency for particle size less than 1 micron.

Rhodia estimates that the acid mist will be below 0.10 lb acid mist/ton acid produced. This will meet the level of control required by NSPS Subpart H.

12-3

According to the instructions for filing an Air Quality Permit PI-1 form, the permit amendment application must address the General Application Requirements, as specified in 30 TAC §116.111. The requirements are listed and addressed in the following section.

#### §116.111. General Application.

In order to be granted a permit, amendment, or special permit amendment, the application must include:

(1) a completed Form PI-1 General Application signed by an authorized representative of the applicant. All additional support information specified on the form must be provided before the application is complete;

A signed Form PI-1 is included in this report. Additional supporting information, as specified on the application form, is included in various other sections of this report.

- (2) information which demonstrates that all of the following are met.
- (2)(A) Protection of public health and welfare.
- (2)(A)(i) The emissions from the proposed facility will comply with all rules and regulations of the commission and with the intent of the TCAA, including protection of the health and physical property of the people.

Operations at Rhodia's Sulfuric Acid Regeneration Unit No. 2 (Regen 2) are consistent with the goal of protecting the public health, welfare, and physical property of the people. This is demonstrated by the Regen 2's compliance with all air quality rules in the Texas Administrative Code, as outlined below.

General Rules: Regen 2 will be operated in accordance with the General Rules relating to circumvention, nuisance, traffic hazard, notification and recordkeeping requirements for major emission events and for startup/shutdown/maintenance, sampling/sampling port/sampling procedures, emissions inventory requirements, compliance with Environmental Protection Agency Standards, the National Primary and Secondary Air Quality Standards, inspection fees, emissions fees, and all other applicable General Rules.

Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter: The operation of Regen 2 may result in occasional visible emissions but not in excess of the opacity limits specified in 30 TAC §111.111. The facility will comply with the allowable particulate matter (PM) emission rate specified in 30 TAC §111.151.

Chapter 112 - Control of Air Pollution from Sulfur Compounds: The Sulfuric Acid Regeneration Unit No. 2 will comply with all requirements of Chapter 112.

Chapter 113 – Control of Air Pollution from Toxic Materials: At this time, Chapter 113 regulates the emission of radionuclides (40 CFR 61, Subpart R), municipal solid waste landfills, hospital/medical/infectious waste incinerators, and hazardous air pollutants for source categories (40 CFR 63). There will be no emissions of radionuclides, and the facility is subject to 40 CFR Part 63, Subpart G, XX and GGG. All of these are authorized in this permit (Permit 4802) and pending Title V Permit O-3049.

Chapter 114 – Control of Air Pollution from Motor Vehicles: All motor vehicles owned or operated by the facility will comply with the applicable provisions of this regulation including maintenance and operation of air pollution control systems or devices, inspection requirements, equipment evaluation procedures for vehicle exhaust gas analyzers, and use of oxygenated fuels.

Chapter 115 – Control of Air Pollution from Volatile Organic Compounds (VOC): The Houston Plant is located in Harris County (part of the Houston/Galveston ozone nonattainment area). Although some of the facilities (such as tanks) are subject to 30 TAC 115, the acid-making process does not belong to any particular process as defined through Division 1 to 6 of 30 TAC 115. The Sulfuric Acid Regeneration Unit No. 2 is not subject to 30 TAC Chapter 115.

Chapter 117– Control of Air Pollution from Nitrogen Compounds: The Houston Plant is located in Harris County, which is designated as a severe nonattainment area for ozone. The Sulfuric Acid Regeneration Unit No. 2 is not subject to Chapter 117 because sulfuric acid regeneration units are exempt per 30 TAC §117.303(a)(4).

Chapter 118—Control of Air Pollution Episodes: The facility will be operated in compliance with the rules relating to generalized and localized air pollution episodes.

Chapter 122-Federal Operating Permits: Rhodia submitted an initial application for Title V operating permit. That application (Permit O-3049) is currently under review. Meanwhile, Rhodia complies with the draft Title V Permit (O-3049) for its Houston Plant.

(2)(A)(ii) For issuance of a permit for construction or modification of any facility within 3,000 feet of an elementary, junior high/middle, or senior high school, the commission shall consider any possible adverse short-term or long-term side effects that an air contaminant or nuisance odor from the facility may have on the individuals attending the school(s).

Rhodia has conducted air dispersion modeling analysis for  $H_2SO_4$ ,  $PM_{10}$ , and  $PM_{2.5}$  in this application. The discussions and results can be found in Section 14.

(2)(B) Measurement of emissions. The proposed facility will have provisions for measuring the emission of significant air contaminants as determined by the executive director. This may include the installation of sampling ports on exhaust stacks and construction of sampling platforms in accordance with guidelines in the "Texas Natural Resource Conservation Commission (TNRCC) Sampling Procedures Manual."

Emissions from any source addressed in the application will be sampled upon request of the Executive Director of the TCEQ, and sampling ports, etc. will be installed as needed.

(2)(C) Best available control technology (BACT). The proposed facility will utilize BACT, with consideration given to the technical practicability and economic reasonableness of reducing or eliminating the emissions from the facility.

Please refer to Section 12 of this application for the BACT analysis of affected equipment.

(2)(D) New Source Performance Standards (NSPS). The emissions from the proposed facility will meet the requirements of any applicable NSPS as listed under Title 40 Code of Federal Regulations (CFR) Part 60, promulgated by the EPA under FCAA, §111, as amended.

The Sulfuric Acid Regeneration Unit No. 2 will be subject to 40 CFR 60 Subparts A, Cd, and H. Subpart A: the unit will comply with all reporting requirements. Subpart Cd: the unit will comply with requirements related to  $H_2SO_4$ . Subpart H: the unit will comply with requirements related to  $SO_2$ , PM and  $H_2SO_4$ 

(2)(E) National Emission Standards for Hazardous Air Pollutants (NESHAP). The emissions from the proposed facility will meet the requirements of any applicable NESHAP, as listed under 40 CFR Part 61, promulgated by EPA under FCAA, §112, as amended.

The Sulfuric Acid Regeneration Unit No. 2 processes hazardous wastes. Hence, it is subject to 40 CFR 61 Subpart FF.

(2)(F) NESHAP for source categories. The emissions from the proposed facility will meet the requirements of any applicable maximum achievable control technology standard as listed under 40 CFR Part 63, promulgated by the EPA under FCAA, §112 or as listed under Chapter 113, Subchapter C of this title (relating to National Emissions Standards for Hazardous Air Pollutants for Source Categories (FCAA §112, 40 CFR 63)).

The Sulfuric Acid Regeneration Unit No. 2 processes hazardous wastes. Hence, it is subject to 40 CFR 63 Subparts G, XX and GGG.

(2)(G) Performance demonstration. The proposed facility will achieve the performance specified in the permit application. The applicant may be required to submit additional engineering data after a permit has been issued in order to demonstrate further that the proposed facility will achieve the performance specified in the permit application. In addition, dispersion modeling, monitoring, or stack testing may be required.

The facility will perform as represented in the permit application. The production rates upon which emission calculations are based will not be exceeded. Control devices will be maintained as necessary to achieve the specified emission reductions.

(2)(H) Nonattainment review. If the proposed facility is located in a nonattainment area, it shall comply with all applicable requirements in this chapter concerning nonattainment review.

Regen 2 is located in a severe nonattainment area for ozone. Emissions of volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated as precursors to ozone formation. In a severe nonattainment area, a major stationary source is defined as having VOC or  $NO_x$  emissions equal to or greater than 25 tons per year. As shown in Section 8.3, project increase for  $NO_x$  and VOC is less than 5 tpy. Therefore, this project is not subject to NA review.

(2)(I) Prevention of Significant Deterioration (PSD) review. If the proposed facility is located in an attainment area, it shall comply with all applicable requirements in this chapter concerning PSD review.

The Sulfuric Acid Regeneration Unit No. 2 at Rhodia's Houston Plant is operating in an attainment area for  $SO_2$ , CO, PM,  $PM_{10/2.5}$ , GHG and lead. As shown in Section 8.2, the project increases of  $SO_2$ , PM,  $PM_{10/2.5}$ , CO, and GHG emissions are less than their corresponding significant thresholds. However, acid mist  $(H_2SO_4)$  is subject to PSD review.

(2)(J) Air dispersion modeling. Computerized air dispersion modeling may be required by the executive director to determine air quality impacts from a proposed new facility or source modification.

Rhodia has conducted dispersion modeling for  $H_2SO_4$ ,  $PM_{10}$ , and PM2.5 in this application. The discussions and results can be found in Section 14.

(2)(K) Hazardous air pollutants. Affected sources (as defined in §116.15(1) of this title (relating to Section 112(g) Definitions)) for hazardous air pollutants shall comply with all applicable requirements under Subchapter C of this chapter (relating to Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources (FCAA, §112(g), 40 CFR Part 63)).

No facility in this application meets the definition of affected source defined in §116.15(1). Therefore, the requirement does not apply.

(L) Mass cap and trade allowances. If subject to Chapter 101, Subchapter H, Division 3, of this title (relating to Mass Emissions Cap and Trade Program), the proposed facility, group of facilities, or account must obtain allowances to operate.

The Houston Plant is located in the Houston/Galveston Nonattainment area. The site is subject to the Mass Emissions Cap and Trade Program due to other  $NO_x$  generating equipment. However, the Sulfuric Acid Regeneration Unit No. 2 is not subject to this program since it is exempt from 30 TAC Chapter 117.

(b) In order to be granted a permit, amendment, or special permit amendment, the owner or operator must comply with the following notice requirements.

(1) Applications declared administratively complete before September 1, 1999, are subject to the requirements of Chapter 116, Subchapter B, Division 3 (relating to Public Notification and Comment Procedures).

Not applicable. The permit amendment application is being sent to the TCEQ after September 1999.

(2) Applications declared administratively complete on or after September 1, 1999, are subject to the requirements of Chapter 39 of this title (relating to Public Notice) and Chapter 55 of this title (relating to Request for Reconsideration and Contested Case Hearings; Public Comment). Upon request by the owner or operator of a facility which previously has received a permit or special permit from the commission, the executive director or designated representative may exempt the relocation of such facility from the provisions in Chapter 39 of this title if there is no indication that the operation of the facility at the proposed new location will significantly affect ambient air quality and no indication that operation of the facility at the proposed new location will cause a condition of air pollution.

According to TCEQ guidance, based on the emission rate increases associated with this project, public notice may be required. Rhodia will perform public notice upon request from the TCEQ as required. Additional information regarding public notice is provided on the PI-1 form of this application.

#### 14.1 PSD ANALYSIS

Sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) from Regen 2 Stack (EPN 104) triggers PSD review. Therefore, PSD modeling analysis is required. Unlike the criteria pollutants, there is no National Ambient Air Quality Standards (NAAQS) for sulfuric acid. 30 TAC §112.41 defines H<sub>2</sub>SO<sub>4</sub> concentration limits for different averaging periods; therefore, air quality analysis for H<sub>2</sub>SO<sub>4</sub> needs to comply with 30 TAC §112.41.

Table 14-1 30 TAC §112.41 Standards for H2SO4

	2000	
Period	Concentration, µg/m³	Details
Anytime	100	Never exceeds
1-hr	50	one-hour period of time more than once during any consecutive 24-hour period
24-hr	15	Never exceeds

An air dispersion modeling analysis is performed for the project related emissions increases. The modeled emission rates and associated source parameters are summarized in Table F-1 in Appendix F. The modeling result for the  $H_2SO_4$  is shown in Tables 14-2.

#### 14.2 STATE ANALYSIS

A State NAAQS air quality dispersion modeling analysis is conducted to evaluate PM<sub>10</sub> and PM<sub>2.5</sub> emissions from the Houston Plant. The techniques used in the air quality dispersion modeling analysis are consistent with current TCEQ and U.S. EPA modeling procedures, as discussed in Section 14.<sup>1,2</sup>

The first step in the analysis is to determine whether the specific project's emissions may have a "significant" impact. If there is no significant impact, the analysis is complete and no further review is required. Otherwise, a more comprehensive modeling study considering other sources of emissions may be required. In the Significance Analysis, the proposed emissions increases of PM<sub>10</sub> and PM<sub>2.5</sub> related to the project from the Houston Plant were evaluated to determine whether they have the potential for a significant impact upon the area surrounding the facility. The modeled emission rates and associated source parameters are shown in Table F-1 of Appendix F. Please note that any give time, only one of the emission source between EPN 104 and EPN CATSCNR2 will be operating. Therefore, modeling was performed for two scenarios using source group option in AERMOD.

Code of Federal Regulations, Title 40-Protection of Environment, Part 51, Appendix W, accessed at www.bna.com.

<sup>&</sup>lt;sup>2</sup> TCEQ, Air Quality Modeling Guidelines, RG-25 (Revised), February 1999.

Per TCEQ modeling guidance, all modeled impacts are reported as the highest first high (H1H) modeled concentration.<sup>3</sup> Since there are no modeling significance levels (MSLs) established for  $PM_{2.5}$ , the strictest U.S. EPA proposed values of  $1.2 \,\mu\text{g/m}^3$  and  $0.3 \,\mu\text{g/m}^3$  are used to compare with the modeled ground-level concentrations for  $PM_{2.5}$  24-hour and annual averaging periods, respectively.<sup>4</sup> The Significance Analysis determines if a Full Impact Analysis is required. Based on the results of the Significance Analysis, a Full Impact Analysis is not required for this air dispersion modeling analysis.

The modeling results for the  $PM_{10}$  and  $PM_{2.5}$  Significance Analysis are shown in Tables 14-3.

#### 14.3 TERRAIN AND LAND USE

The terrain is flat for the site. The latest National Elevation Dataset (NED) near the site is obtained from U.S. Geological Survey (USGS) for determining the elevations. The simple Auer method is used to determine the land use. As shown in Appendix E, more than 70% of the land is in red or white (for industrial sites) area, the land use can be classified as urban.

#### 14.4 SURFACE ROUGHNESS

The terrain is flat for the site. The latest National Elevation Dataset (NED) for Southeast Texas (texas\_se\_NLCD\_092800\_flat.bin) is obtained from U.S. Geological Survey (USGS) for determining the elevations. The EPA's AERSURFACE software is used to calculate the albedo, Bowen ratio and surface roughness length surrounding the plant. To be conservative, all possible conditions for surface moisture (average, wet and dry) are run. Regardless of the options, each run gives an average roughness of 0.375 meter (Appendix E). Therefore, the roughness is medium.

#### 14.5 AERMOD MODEL

The AERMOD model (version 09292) is used in conducting the air modeling analysis for the Houston Plant to estimate the maximum concentration at the property line and surrounding receptors.

In this analysis, air dispersion modeling analysis is performed using the regulatory default options, which include stack heights adjusted for stack-tip downwash, buoyancy-induced dispersion, and final plume rise. Ground-level concentrations occurring during "calm" wind conditions are calculated by the model using the calm processing feature. Regulatory default values for wind profile exponents and vertical potential temperature gradients are used since representative on-site meteorological data was not utilized. As per U.S. EPA requirements, direction-specific building dimensions are used in the downwash algorithms.

<sup>&</sup>lt;sup>3</sup> TCEQ, Air Quality Modeling Guidelines, RG-25 (Revised), February 1999.

<sup>&</sup>lt;sup>4</sup> Prevention of Significant Deterioration (PSD) for Particulate Matter Less Than 2.5 Micrometers (PM<sub>2.9</sub>)-Increments, Significant Impact Levels (SILs) and Significant Monitoring Concentration (SMC); Federal Register, Vol. 72, No. 183, 54112, September 21, 2007.

# 14.6 RECEPTOR GRIDS

In the air dispersion modeling analysis, ground-level concentrations are calculated within four receptor grids. These four grids cover a region extending at least 10 km from all edges of the Houston Plant property line. Receptor grids near the modeled facility require closer spacing to ensure the highest concentration is captured. In most situations, the maximum concentrations are found on or near a facility's property line. For this dispersion modeling analysis, the receptor grids are defined as follows:

- 1. The "property line grid" is a discrete receptor grid with the receptors spaced at 25-m intervals along the property line;
- 2. The "tight grid" contains 25-m spaced receptors extending at least 300 m from the property line exclusive of the receptors within the property line;
- 3. The "fine grid" contains 100-m spaced receptors extending at least 1 km from the property line exclusive of the receptors in the tight grid;
- 4. The "medium grid" contains 500-meter spaced receptors extending 5 km from the property line exclusive of receptors in the fine grid; and
- 5. The "coarse grid" contains 1,000-meter spaced receptors extending 10 km from the property line exclusive of receptors in the medium grid.

# 14.7 METEOROLOGICAL DATA

Per TCEQ guidance for sources located in Harris County, the dispersion modeling analysis uses preprocessed meteorological data based on surface measurements made at the Houston International Airport Station (National Weather Service (NWS) station number 12960) and upper air measurements made at Lake Charles, Louisiana (NWS station number 03937).

Pre-processed meteorological files obtained from the TCEQ allow the choice of various roughness lengths (i.e., low, medium, and high) based on the land use surrounding the facility under evaluation. As discussed in Section 14.4, the average roughness based on AERSURFACE is 0.375 meter. Therefore, the TCEQ meteorological files from Year 1987 through 1991 containing medium surface roughness parameters for Harris County are used in the modeling analysis.

#### 14.8 DOWNWASH

The emission source is evaluated in terms of its proximity to nearby structures. The purpose of this evaluation is to determine if stack discharges could be entrained in the turbulent wakes of these structures. Wind blowing around a building creates zones of turbulence that are greater than if the building was absent.

Direction-specific building dimensions and the dominant downwash structure parameters used as inputs to the dispersion models are determined using the BREEZE-WAKE/BPIP software, developed by Trinity Consultants, Inc. This software incorporates the algorithms of the U.S. EPA-sanctioned

Building Profile Input Program with PRIME enhancement (BPIP-PRIME), version 04274. BPIP-PRIME is designed to incorporate the concepts and procedures expressed in the GEP Technical Support document, the Building Downwash Guidance document, and other related documents.

The output from the BPIP-PRIME downwash analysis lists the structures' names and dimensions and the emission unit locations and heights. In addition, the output contains a summary of the dominant structure for each emission unit (considering all wind directions) and the actual building height and projected widths for all wind directions. This information is then incorporated into the data files for the AERMOD model. The Houston Plant modeled downwash structure heights for each structure that is considered in the downwash analysis are proved in Table F-2 in Appendix F of this report.

#### 14.9 URBAN OPTION

In AERMOD setup, the land-use has considered the fact that the Houston Plant is located in a relatively urban area. The default roughness of 1 is used for AERMOD.

In addition, the population of this area is determined based on U.S. Census Bureau latest statistics (Year 2001). The population density of Houston is 3,371.7 people per square mile (See Appendix E). An area with 3 miles (5 km) radius is 28.26 miles<sup>2</sup>. This gives 95,284 people.

# 14.10 MODELED SOURCES EMISSIONS AND PARAMETERS

The modeled source emissions and associated parameters related to the sulfuric acid,  $PM_{10}$  and  $PM_{2.5}$  emission increases related to this project are provided in Table F-1 of Appendix F.

### 14.11 MODELING RESULTS

The modeling results for the  $H_2SO_4$  are shown in Tables 14-2. As shown in Table 14-2, predicted concentrations for 1-hour and 24-hour averaging periods are less than the corresponding standards. At any time, there is no concentration higher than  $100 \ \mu g/m^3$ . Therefore, compliance demonstration is complete for  $H_2SO_4$ .

The modeling results for the  $PM_{10}$  and  $PM_{2.5}$  Significance Analysis are shown in Tables 14-3. As can be seen in Table 14-3, the  $GLC_{max}$  is less than the corresponding MSLs. Therefore, no further evaluation is required for  $PM_{10}$  (24-hour averaging period) and  $PM_{2.5}$  (24-hour and annual averaging periods) for the State NAAQS Analysis.

Table 14-2. H<sub>2</sub>SO<sub>4</sub> Modeling Results

Pollutant	Averaging Period	Met Year	Maximum (H1H) Modeled Concentration (μg/m³)	Standard (µg/m³)	H1H < Standard
	1-hour		1.35	50	Yes
	24-hour	1987	0.42	15	Yes
	1-hour	4000	1.25	50	Yes
	24-hour	1988	0.38	15	Yes
	1-hour		1.35	50	Yes
$H_2SO_4$	24-hour	1989	0.36	15	Yes
	1-hour		1.30	50	Yes
	24-hour	1990	0.40	15	Yes
	1-hour		1.32	50	Yes
	24-hour	1991	0.38	15	Yes

Table 14-3.  $PM_{10}$  and  $PM_{2.5}$  Significance Modeling Analysis Results

Pollutant	Averaging Period	Met Year	Source Group	Maximum (H1H) Modeled Concentration (μg/m³)	SIL (µg/m³)	H1H < SIL	
	PM <sub>10</sub> 24-hour		EPN104	0.88	5	Yes	
$PM_{10}$		24-hour	CATSCNR2	0.10	<u> </u>	Yes	
				EPN104	0.88	1.2	Yes
	24-hour	1988	CATSCNR2	0.10	1.2	Yes	
$PM_{2.5}$			EPN104	0.15	0.2	Yes	
Annu	Annual		CATSCNR2	0.02	0.3	Yes	

# 15.1 **GROWTH**

Since this project will only have moderate modification or construction, it will not have any associated emissions with other industrial, commercial or residential sources. Therefore, there will be no growth related to this project. Additional air emissions are not expected.

## 15.2 SOIL AND VEGETATION

The site and its surrounding area is a mixture of well-developed residential and industrial area. There is no agricultural land or important vegetation. Hence, the impact on soil and vegetation should be negligible.

## 15.3 VISIBILITY IMPAIRMENT

For Class II areas, Rhodia will comply with the visibility and opacity requirements of 30 TAC Chapter 111. Details of the compliance procedures will be in the Title V permit (application pending approval).

For Class I areas, the EPA has a modeling guidance of "Workbook for Plume Visual Impact Screening and Analysis (EPA, 1992c)". However, a level-1 screening modeling was not performed based on the reasons listed below:

- 1. The VISCREEN model has a regulatory application limitation of 50 km.
- 2. The site is about 528 km from the nearest Class I area (Caney Creek Wilderness, Arkansas). This is much bigger than the 100 km requirement.

Hence, the project will not pose any visual impairment for Class I areas.

The Federal Land Managers (FLM) is responsible to manage Class I areas. FLM also has an affirmative responsibility to protect the air quality related values (AQRV) for these areas. A PSD application needs to get an approval or a waiver of AQRV analysis from a FLM division that is in charge of a particular Class I area.

The nearest Class I area to the Houston Plant is the Caney Creek Wilderness, Arkansas. On behalf of Rhodia, Trinity will submit a request to FLM to waive the detailed AQRV analysis.

**EMISSION CALCULATIONS** 

#### **EPN 104**

#### Regeneration Unit No. 2 Stack

Parameters:

Regen 2 Sulfuric Acid Production Rate: 1,150 tons/day
Annual Hours of Operation: 8,760 hr/yr

[1]

NOx Emissions

(for 1-hour averaging) 96.8 ppmv NOx Concentration: (for annual averaging) 36.8 ppmv [2] 55,145 acfm Exhaust Flow Rate: 549 R [2] Exhaust Temperature: 1.0123 atm [3] Exhaust Pressure: 0.73024 ft^3-atm/(lbmole-R) Ideal Gas Constant

HCl and Cl2 Emissions

Feed rate of chlorinated materials to furnace:

Cl<sub>2</sub> emissions ratio:

Cl<sub>2</sub> emissions ratio:

HCl removal efficiency:

99.969%

[4]

CO<sub>2</sub> Emissions

Average vol.%

8%

Maximum vol.%

10%

Current production rate

969 tons of acid/day

**Emission Factors:** 

Pollutant	Emission Factor	Units	Emission Factor Reference
H <sub>2</sub> SO <sub>4</sub> (acid mist)	0.15	lb mist/ton acid, Hourly	[6]
H <sub>2</sub> SO <sub>4</sub> (acid mist)	0.1	lb mist/ton acid, Annual	[7]
SO <sub>2</sub>		lb SO <sub>2</sub> /ton acid,	[7]
SO <sub>2</sub>	1.8	lb SO <sub>2</sub> /ton acid,	[7]

Emissions (per unit):

Pollutant	Max. Hourly Emissions lb/hr	Annual Emissions ton/yr
PM	4.01	12.47
PM <sub>10</sub>	4.01	12.47
PM <sub>2.5</sub>	4.01	12.47
H <sub>2</sub> SO <sub>4</sub>	7.19	20.99
CO <sub>2</sub> -e	43,627.01	152,869.03
SO <sub>2</sub>	143,75	377.78
NOx	37.20	61.95
HCl	0.16	0.70
Cl <sub>2</sub>	0.011	0.048

- [1] Data provided by Rhodia.
- [2] Based on data provided by Rhodia in an email dated 5/11/2011.
- [3] Based on stack testing data from other Rhodia plants as provided in the 2006 Houston Plant permit 4802 amendment.
- [4] From hazardous waste permit HW50095 as provided in the 2006 Houston Plant permit 4802 amendment
- [5] Based on furnace test data provided by Rhodia in the 2006 Houston Plant permit 4802 amendment.
- [6] Based on EPA BACT emission rate for lb mist/ton acid produced.
- [7] Emission factors are based on estimations provided by Rhodia.
- [8] Based on February 2011 stack testing data and acid production rate from Unit 2, Baton Rouge Rhodia plant.
- [9] Based on RCRA test conducted in October 2010, ideal gas law and ratio of proposed/current acid production.
- [10] Emission rates are calculated based on ideal gas law.

Sample	Calculations:
--------	---------------

Sample Calculations:							
SO 2 Maximum Hourly Emissions		1.150	1 dov				
_	3.00 lb SO2	1,150 tons acid	1 day 24 hr	=	143.75 lb/hr		
	ton acid	day	24 111				
SO . Annual Emissions							
1,80 lb SO2	1,150 tons acid	1 ton	1 day	8,760 hr	=	377.78 toп/ут	
ton acid	day	2000 lb	24 hr	уr			
PM/PM 10/PM 25 (non-acid) Maximum H			1 L I	day			
-	5.28 lb	1,150 tons acid day	hr 63.12 tons acid	day 24 hr	==	4.01 lb/hr	
	hr [	day	05.12 (0115 acid	2			
PMPM 10/PM 25 (non-acid) Annual Emi	ssions						
3.75 lb	1,150 tons acid	hr	8,760 hr	1 ton	day	-	12.47 ton/yr
hr	day	63.12 tons acid	уt	2000 lb	24 hr		
•	•						
NOx Maximum Hourly Emissions	_		r				
96.8 ppmv	55,145 acf	1.0123 atm	46 lb/lbmole	60 min	. =	37.20 lb/hr	
10^6	min	549 R	0.7302 atm-ft3/lbmole-R	hr			
NOx Annual Emissions	1	1.0102	46 lb/lbmole	60 min	8,760 hr	1 ton	
36.8 ppmv	55,145 acf	1.0123 atm 549 R	0.7302 atm-ft3/lbmole-R		yr	2000 lb	= 61.95 ton/yr
10^6	min	J45 K	10.7502 man terromote 14		1 ,- ,		
VOI Marine Hearth Emissions							
HCl Maximum Hourly Emissions	502.8 lb Cl	36,5 lb/lbmole HCl	1 lbmole HCl	1 - 99,969 %	<b>-</b> =	0.16 lb/hr	
•	hr	35.5 lb/lbmole Cl	lbmole Cl			0.1010111	
			•				
HCl Annual Emissions							
	0,16 lb	8,760 hr	1 ton	. =	0.70 ton/yr		
	hr	yr	2000 lb				
Cl <sub>2</sub> Maximum Hourly Emissions	A . C 11 TTO1	l 15 C1					
	0.16 lb HCl	16 Cl <sub>2</sub> 14,706 lb HCl	<del>-</del> '=	0.011 lb/hr			
	hr	14,700 10 HCI					
Cl 2 Annual Emissions							
Cl 2 Annual Emissions	0.011 lb	8,760 hr	1 ton	_	0.049 ton/co		
	hr	yr	2000 lb	. =	0.048 ton/yr		
		1 2.	1				
H 2 SO 4 (acid mist) Maximum Hourly En	nissio <u>ns</u>						
		1					
	0.15 lb acid mist	1,150 tons acid	day	<b>-</b> =	7.19 lb/hr		
	ton acid	day	24 hr				
, , ,							
H <sub>2</sub> SO <sub>4</sub> (acid mist) Annual Emissions							
0.10 th	1,150 tons acid	l 1+	8,760 hr	đay		00.00	
0.10 lb acid mist		1 ton 2000 lb	yr	24 hr	=	20.99 ton/уг	
ton acid	day	2000 10	1 7-	1			
CO 2 Maximum Hourly Emissions							
1.0123 atm * 55145 acfm	44 lb/lbmole	60 min	lbmole-R	1,150	10%	_ =	43627 lb/hr
549 R	lbmole	hr	0.7302 atm-ft3	969			
2 15 22	1	•	*				
CO 2 Annual Emissions							
1.0123 atm * 55145 acfm	44 lb	60 min * 8760 hr	lbmole-R	1,150	8%	_ =	152869 tpy
549 R	lbmole	hr * year	0.7302 atm-ft3	969	2000 lb		•-
	•						

**EPN** 

CATSCNR2

FIN

CATSCNR2

Description

Catalyst screening for Regen 2

This is an MSS event related to catalyst screening.

218 hours/year

Total Volume screened

200,000 liters/year 650 kg/m^3

**Bulk Density** Conversion factor

2.205 lb/kg

Conversion factor

1,000 liter/m^3 Volume (liters/ year) \* 1m^3/1000L \* 650 kg/m^3 \* 2205 lb/kg

Total Mass =

Total Mass =

286,650 lbs/year

**Emission Factor** 

0.05%

Uncontrolled Emission lb/hr =

Processed lb/hr \* Emission Factor

Uncontrolled Emission

143.33 lb/ year

Uncontrolled Emission lb/hr

0.66 lb/hr

**Baghouse Parameters** 

Dagilouse I traineters	
Filter control eff.	99 %
Maximum loading	20000 ft^3/min
Average loading	5000 ft^3/min
Factor	7000 grain/lb

Controlled Emissions (lb/hr) =

Uncontrolled Emissions (lb/hr) \* [1 - Control efficiency (%)]

Controlled Emissions (tpy) =

Controlled Emissions (lb/hr) \* hours/year \* 1ton/2000 lb

Pollutant	lb/hr	TPY
PM/PM <sub>10</sub> /PM <sub>2.5</sub> (catalyst screening)	6.57E-03	7.17E-04

Conversion of control efficiecny to grain/scf

Grain Loading (grain/scf) =

Emission (lb/hr) \* 1hr/60min \* min/5000 scf \* 7000 grain/lb

Grain Loading (grain/scf) =

0.000153406 grain/scf

The grain loading is < 0.01 grain/scf which meets the current TCEQ BACT.

STACK TEST RESULTS

Table B-1. Test Results with Method 5/202 - Average 1,514.9 tons of acid/day Baton Rouge Plant Unit 2

Test Method	2/11/2011	2/11/2011	2/11/2011	2/11/2011	Average (lb/hr)
	Run 1	Run 2	Run 3	Run 4	(10/nr)
	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	
Method 5 (Filterable)	0.551	0.378	0.692	1.037	0.66
Method 202 (Condensable)	1.62	3.44	3.05	4.24	3.09
Total Method 5 and 202	2.17	3.82	3.74	5.28	3.75

Table B-2. Houston Regen 2 CO<sub>2</sub> Test Results

		Mode A			Mode B	
Gas Data	10/13/2010 Run 1	10/14/2010 Run 2	10/14/2010 Run 3	10/19/2010 Run 1	10/20/2010 Run 2	10/20/2010 Run 3
CO2 vol.% , dry basis	8	7.8	7.7	8.3	8.2	8.2
Average gas flow, acf/min	55165	54251	55636	52146	51352	51218
Exhaust Temperature, R	574	568	577	579	581	583

Stack Test Report for Baton Rouge Plant Unit 2

# USEPA CONSENT DECREE TESTING AND RELATIVE ACCURACY TEST AUDIT REPORT RHODIA, INC. SULFURIC ACID REGENERATION UNIT NO. 2 BATON ROUGE, LOUISIANA TEST DATES: 15-16 FEBRUARY 2011

Prepared for:

RHODIA, INC. 1275 Airline Highway Baton Rouge, LA 70805

Prepared by:

WESTON SOLUTIONS, INC.

1400 Weston Way P.O. Box 2653 West Chester, Pennsylvania 19380

March 2011

W.O. No. 12143,078.010.0001

#### TABLE I RHODIA INC-BATON ROUGE, LA UNIT 2 STACK

#### SUMMARY OF OTM 028 PARTICULATE TEST DATA AND TEST RESULTS

Test run number Loaction	t	2 UNIT 2 STACK	3
Test date	02/15/11	02/15/11	02/15/11
Test time	0938-1054	1142-1257	1418-1530
Sampling data:			
Sampling duration, min.	. 60	60	60
Nozzle diameter, in.	0.195	0.190	0.190
Cross sectional nozzle area, sq.ft.	0.000207	0.000197	0,000197
Barometric pressure, in. Hg	30,17	30.17	30.17 1.55
Avg. orifice press. diff., in H <sub>2</sub> O	1.61	1.49	1.55 76.5
Avg. dry gas meler temp., deg F	71.8 532	72.9 533	70.3 537
Avg. abs. dry gas meter temp., deg. R	40.0	37.8	42.4
Total liquid collected by train, ml Std. vol. of H <sub>2</sub> O vapor coll., cu.ft.	1,9	1.8	2.0
Dry gas meter calibration factor	0.9810	0.9810	0.9810
Sample vol. at meter cond., def	43.809	42.711	43.881
Sample vol. at std. cond., dscf (1)	43,178	41.996	42,863
Percent of isokinetic sampling	98.2	100.4	100.7
GAS STREAM COMPOSITION DATA:			
CO2, % by volume, dry basis	5,2	5.5	5.8
O3. % by volume, dry basis	8.4	8.3	8.3
N <sub>2</sub> , % by volume, dry basis	86,4	86.2	85,9
Molecular wt. of dry gas, lb/lb mole	29,17	29,2]	29,26
H <sub>2</sub> O vapor in gas stream, prop. by vol.	0.042	0.041	0.045
Mole fraction of dry gas	0.958	0.959	0.955
Molecular wt. of wet gas, lb/lb mole	28.70	28.76	28.76
GAS STREAM YELOCITY AND VOLUMETRIC FLOW DATA:			
Static pressure, in. H <sub>2</sub> O	0.85	0.85	0,85
Absolute pressure, in. Hg	30.23	30.23	30,23
Avg. temperature, deg. F	83.0	83,3	84.0
Avg. absolute temperature, deg. R	543	543 0.84	544 8.84
Pitot tube coefficient	0.84	24	24
Total number of traverse points	24 62,6	62.7	64.1
Avg. gas stream velocity, ft/sec. Stack/duct cross sectional area, sq.ft.	28.270	28.270	28,270
Avg. gas stream volumetric flow, waci/min.	106,190	106,306	108,778
Avg. gas stream volumetric flow, dselimin.	99,926	100,106	101,892
PARTICULATE LABORATORY REPORT DATA			
Front half acetone rinse, g	0.0010	0.0012	0.0011
Filter, g	8000.0	0.0000	0.0011
Total particulate catch weight, g (2)	0.0018	0.0012	0.0022
FILTERABLE PARTICULATE EMISSIONS		A 2004	0.0008
Conc., gr/dscf	0.0006	0.0004 0.378	0.692
Emission rate, lbs/hr	0.551	0.378	0,692
CONDENSIBLE PARTICULATE LABORATORY REPORT Implager residue, g	0.0063	0.0119	0.0107
Blank Train hnoinger residue, g	0,00100	0.00100	0.00100
Blank corrected Impinger residue, g	0.00530	0.01090	0.00970
CONDENSIBLE PARTICULATE EMISSIONS			
Cono., gr/dscf	0.0019	0.0040	0.0035
Emission rate, lbs/hr	1.62	3,44	3.05
TOTAL PARTICULATE EMISSIONS			
Filterable and Condensible Cone., gridsef	0.0025	0.0044	0,0043
Emission rate, lbs/hr	2.17	3.82	3.74
SODIUM LABORATORY REPORT DATA	•		
FHA and Filter, g	0.000056	0,000081	0,000069
SODIUM EMISSIONS	0.000000	0.000020	0.000034
Conc., gr/dsef	0.000020	0.000030	0.000025
Emission rate, lbs/ur	0.017	0,026	0.022
Percent of total filterable particulate, %	3.11	6.75	3.14

<sup>(1)</sup> Standard conditions = 68 deg. F. (20 deg. C.) and 29.92 inches Hg (760mm Hg).

#### TABLE 2

# RHODIA INC-BATON ROUGE, LA

#### UNIT 2 STACK

#### SUMMARY OF OTM 028 PARTICULATE TEST DATA AND TEST RESULTS

SUMMARY OF OTM 028 PARTICULA	ITE TEST DATA AN
TEST DATA: Test run number Leaction Test date Tost time	4 UNIT 2 STACK 02/15/11 1605-1717
SAMPLING DATA: Sampling duration, tuin. Nozzle diameter, in. Cross sectional nozzle area, sq.ft. Barometric pressure, in. Hg	60 0.190 0.000197 30.17
Avg. orifice press. diff., in H <sub>2</sub> O  Avg. dry gas meter temp., deg F  Avg. abs. dry gas meter temp., deg. R  Total liquid collected by train, ml  Std. vol. of H <sub>2</sub> O vapor coll., cu.ft.	1.54 77.1 537 42.7 2.0
Dry gas meter calibration factor Sample vol. at meter cond., def Sample vol. at std. cond., dsef (1) Percent of isokinetic sampling	0.9810 43.815 42.750 100.7
GAS STREAM COMPOSITION DATA: CO <sub>1</sub> , % by volume, dry basis O <sub>2</sub> , % by volume, dry basis N <sub>2</sub> , % by volume, dry basis Molecular wt. of dry gas, lb/lb mole H <sub>2</sub> 0 vapor in gas stream, prop. by vol. Mole fraction of dry gas	5.9 8.4 85.7 29.28 0.045 0.955
Molecular wt. of wel gas, lb/lb mole  GAS STREAM VELOCITY AND VOLUMETRIC FLOW DATA:	28.77
Static pressure, in. H <sub>2</sub> O Absolute pressure, in. Hg Avg. temperature, deg. F Avg. absolute temperature, deg.R Pitot tube coefficient Total number of traverse points	0.85 30.23 83.5 544 0.84 24
Avg. gas stream velocity, ft./sec. Stack/duct cross sectional area, sq.ft. Avg. gas stream volumetric flow, wachinin. Avg. gas stream volumetric flow, dsef/min.	63.9 28.270 108,412 101,599
PARTICULATE LABORATORY REPORT DATA Front half acctone rinse, g Filter, g Total particulate catch weight, g <sup>(2)</sup>	0.0009 0.0024 0.0033
FILTERABLE PARTICULATE EMISSIONS Conc., gr/dscf Emission rate, lbs/hr	0,0012 1.037
CONDENSIBLE PARTICULATE LABORATORY REPORT impinger residue, g Blank Train impinger residue, g Blank corrected impinger residue, g	0.0145 0.00100 0.08350
CONDENSIBLE PARTICULATE EMISSIONS Conc., gridsof Emission rate, lbs/hr	0.0049 4,24
TOTAL PARTICULATE EMISSIONS Filterable and Condensible Cone., gr/dscf Emission rate, lbs/hc	0.006) 5.28
SODIUM LABORATORY REPORT DATA FHA and Filter, g	0.000061
SODIUM EMISSIONS Conc., gr/dscf Emission rate, lbs/hr	0,000022 0.019
Percent of total filterable particulate, %	1,85

<sup>(1)</sup> Standard conditions = 68 deg. F. (20 deg. C.) and 29.92 inches Hg (760mm Hg).

Stack Test Report for Houston Regen 2 CO<sub>2</sub> Test

Table 2-3 Summary of Emissions Test Results - Mode A

Parameter		Test R	esults		RCRA Permit
	Run 1	Run 2	Run 3	Average	Limit
Particulate Matter (PM)	0.00044	0.00075	0.00110	0.00076	0.08 gr/dscf @ 7% O <sub>2</sub>
Hydrogen Chloride (HCl)	0.024	0.027	0.029	0.027	0.103 g/sec
Chlorine (Cl <sub>2</sub> )	0.0022	< 0.0018	< 0.0021	≤ 0.0020	0.093 g/sec
Carbon Monoxide (CO) <sup>1</sup>	0.6	0.6	0.6	0.6	100 ppm @ 7% O <sub>2</sub> (1 hour rolling average)
Arsenic <sup>2</sup>	4.85E-5	4.79E-5	1.02E-4	6.61E-5	2.58E-4 g/sec
Beryllium (using RL) <sup>3</sup>	< 5.75E-7	< 5.78E-7	< 5.70E-7	< 5.74E-7	1.6E-6 g/sec
Cadmium (using RL) <sup>3</sup>	1.66E-5	<2.31E-6	4.63E-5	≤2.17E-5	5.19E-5 g/sec
(using MDL) <sup>3</sup>	1.66E-5	< 7.39E-8	4.63E-5	≤2.09E-5	5.19E-5 g/sec
Hexavalent Chromium (using RL) <sup>3</sup>	< 8.68E-6	< 9.44E-6	< 8.68E-6	< 8.93E-6	3.54E-4 g/sec
(using MDL) <sup>3</sup>	< 2.28E-6	< 2.25E-6	< 2.23E-6	< 2.25E-6	3.546-1 g/sec
Antimony	6.28E-5	1.25E-4	6.19E-5	8.32E-5	NA <sup>5</sup>
Lead	6.64E-5	4.83E-5	8.29E-5	6.59E-5	NA <sup>3</sup>
Mercury	1.70E-4	2.04E-4	3.43E-4	2.39E-4	1.95 E-4 lb/hr
Barium	3.20E-5	< 1.83E-5	4.05E-3	≤1.37E-3	NA <sup>3</sup>
Silver	< 1.83E-5	< 1.83E-5	4.79E-5	≤2.82E-5	NA <sup>5</sup>
Thallium	< 1.83E-5	< 1.83E-5	<1.81E-5	< 1.82E-5	NA <sup>5</sup>
Nickel	2.61E-4	1.53E-4	2.08E-4	2.07E-4	8.00 E-4 lb/hr
Selenium	< 1.83E-5	2.93E-4	7.65E-5	≤1.29E-4	NA
Chlorinated Dioxins and Furans <sup>4</sup>	6.51E-12	6.02E-11	4.01E-11	3.56E-11	2.0E-7 g/sec
Nitrogen Oxides as NO2, lb/hr1	13.00	13.44	14.68	13.71	****
Total Hydrocarbon as propane, lb/hr1	0.072	< 0.036	< 0.035	≤0.048	

<sup>1</sup> Carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>) and total hydrocarbon (THC) individual test run averages from temporary CEM system used during the trial burn. CO results are corrected to 7% O2.

HIGH FLIANIAG TEMPERPTURE

Metals results are blank corrected using site blanks (SB) and blank train (BT) analytical data.

Metals that were "non-detect" during analysis are reported using RL (Reporting Limit) or MDL (Method Detection Limit) for comparison to RCRA Permit

Maximum TEQ emission rates.

<sup>5</sup> NA - Not Applicable

Table 3-2 Summary of Process Operating Conditions During the Trial Burn - Mode A

Paramete	r	Current		Mod	e A		Proposed Limit <sup>2,3</sup>
		Limit	Run 1	Run 2	Run 3	Average	
Hazardous Waste Feed Rate, l	bs/min	464.81	333.90	341.42	340.39	338.57	313.26
Total Spike Stream Feed Rate	NA	12.79	12.80	12.79	12.79	313.20	
Bucket/Bag Feed Rate, per ho	20	0	0	0	0	20	
Minimum Main Gas Blower S	O <sub>2</sub> , %	5.5	8.36	8.26	9.03	8.55	5.5
Sulfuric Acid Production, ton/	hr	38.28	28.52	27.93	28.00	28.15	38.28
Combustion Chamber Temper	ature, °F (max)	2,127	2150.94	2142.88	2146.29	2146.70	2146.70
Combustion Gas Velocity, AC	FM (existing)	186,137	167,907	165,720	165,435	166,354	
Combustion Gas Velocity, AC	FM (proposed)	186,137	172,897	170,429	170,178	171,168	171,168
Hourly Rolling Average for C	O, (ppmv)	100	2.72	4.69	2.14	3.18	100
Combustion Chamber Pressur	e, H <sub>2</sub> O	0.0	-1.41	-1.35	-1.37	-1.38	0.0
ESP Inlet Temperature, °F		120	90.09	86.07	89.33	88.50	120
Pressure Drop Across Demist	er, in H2O	3	16.47	16.19	16.31	16.32	3
Total Description IVI	ESPI	50	67.77	67.85	68.22	67.95	50
Total Power to ESP, KV	ESP2	50	66,36	66.01	65.94	66.10	50

<sup>(1)</sup> 

Buckets/Bags were not fed during the Trial Burn.
Proposed limits are based upon averages of Mode A and/or Mode B values where applicable.
Proposed hazardous waste feed rate limit includes all waste feeds and spike streams. (2)

TABLE 6-1 RHODIA - HOUSTON, TX SUMMARY OF PARTICULATE, HCL2, CL2, NOX, and THCTEST DATA AND TEST RESULTS

•						
TEST DATA:	_					
Test run number	ſ		. 2		3	
Location			Unit 2			
Condition			Mode A			
Test date	10-13-10		10-14-10		10-14-10	
Test time period	0920-1204		0835-1172		1435-1714	
SAMPLING DATA:						
Sampling duration, min.	120		120		120	
	0.248		0.248		0.248	
Nozzle diameter, in.	0.000335		0.000335		0.000335	
Cross sectional nozzle area, sq.ft.	29.90		30.02		30.02	
Hammetric pressure, in. Hg	1.33		1.30		1.38	
Avg. orifice press. diff., in H2O	89.5		76.5		95.3	
Avg. dry gas meter temp., deg F	* * *		537		555	
Avg. abs. dry gas meter temp., deg R	550				3.2	
Total liquid collected by train, mi	6.5		5.8		0.2	
Std. vol. of [120 yapor coll., cu.ft.	0.3		0.3			
Dry gas meter calibration factor	0.9970		0.9970		0,9970 77,143	
Sample vol. at meter cond , def	75.511		73.784			
Sample vol. at sid. cond., dscf(1)	72,497		72.836		73.589	
Percent of isokinetic sampling	99.2		100.0		99.8	
GAS STREAM COMPOSITION DATA:	•					_
CO2, % by volume, dry basis	8.0		7.8		7.7 €	- CO2
	7.6		7.6		7.4	
O2, % by volume, dry basis	84.4		84.6		84.9	
N2. % by volume, dry hasis	29.58		29,55		29.53	
Molecular wt. of dry gas, Ib/Ib mole	0.004		0.004		0.002	
H2O vapor in gas stream, prop. by vol.			• • • • • • • • • • • • • • • • • • • •		0.998	
Mole fraction of dry gas	0.996		0.996			
Molecular wt. of wet gas, lively mole	29.5		29.5		29.5	
GAS STREAM VELOCITY AND VOLUMETRIC FLOW DATA:						
Static pressure, in. 1120	6.60		03,3		6.60	
	0.485		0.485		0.485	
Static pressure. In. Hg	30.39		30.51		30.51	
Absolute pressure, in Hg	1(4		801		117	
Avg. temperature, deg. F			568		577	
Avg. absolute temperature, sleg.R	574		0.84		0.84	
Pitot tube coefficient	0.84					
Total number of traverse points	12		12		12	
Avg. gas stream velocity, ft/sec.	32.5		32.0		32.8	
Stack/duct cross sectional area, sq.ft.	28.274		28.274		28.274	
Avg. gas stream volumetric flow, waefmin.	55165		5425L		55636	
Avg. gas stream volumetrie flow, dscf/mln.	51330		51166		51802	
Average SCFM (All tests per run)	52314		52103		51485	
PARTICULATE LABORATORY REPORT DATA			0.0034		0.0030	
Front half acetone riuse, g	0.0030		0,0030		0,0020	
Filter, g	0000.0		0.0004		0.0031	
Fotal paniculate cutch weight, g	0,6020		0.0034		0.0051	
sorbt kattlemate enten merkine &	-,					
PARTICULATE EMISSIONS						
Conc., gr/dsef (uncorrected)	0.00013		0,00072		0.00107	
Conc., gr/dscf @ 7% Uz	0,00044		0.00075		0.00110	
Emission rate, lbs/hr	0.18731		0.31593		0.474\$8	
4-bithadioul two-f ico-m						
CI, LABORATORY REPORT DATA						
Total Cl <sub>2</sub> , mg	0.19	<€	0.15	<	0.18	
CI, EMISSIONS						
Concentration, lbs/dscf	5,6612-09	≺	4.54E-09	<	5.245-09	
Concentration, ppm/v	0.03	<	0.02	<	0.63	
Concentration, ppm'v @ 7% O.	0.03	<	0.03	<	0.03	
Mass rate. His hr	0.02	<	0.01	<	0.62	
Mass rate, g/sec	0.6022	<	0.0018	<	0.8021	
HCL LARORATORY REPORT DATA	2 650		2 300		2.430	
Fotal EICI. mg	5.430		2 300		2,4,0	
HCI EMISSIONS						
Concentration, lbs/dsef	6.23E-08		6.96E-08		7.28F.08	
Concentration, ppm/v	0.66		B.74		0.77	
Concentration, printy @ 784 O.	0.69		0.77		0.79	
Mass rate. (by-hr	0.19		021		0.23	
Mass rate, g/sec	0.024		0.027		0.029	
•						
NOX AND THE EMISSIONS					4A 4	
NOX, ppm (as NO2)	34.7		36		39.8	
THC, ppm (as propane)	0.2	<	0.1	<	9.1	
			13		11.40	
NOX, Ibihr (as NO2)	13.00		13.44	_	14.68	
THC. 16 hr (as propane)	0.072	<	0.036	<	0,035	

(1) Standard conditions = 68 deg. F. (20 deg. C.) and 29.92 inches Hg (760mm Hg).

Table 2-4 Summary of Emissions Test Results - Mode B

Parameter		Test ]	Results		RCRA Permit
	Run 1	Run 2	Run 3	Average	Limit
Particulate Matter (PM)	0.00093	0.00098	0.00079	0.00090	0.08 gr/dscf @ 7% O <sub>2</sub>
Hydrogen Chloride (HCl)	0.013	0.014	0.024	0.017	0.103 g/sec
Chlorine (Cl <sub>2</sub> )	< 0.0014	< 0.0017	< 0.0013	< 0.0015	0.093 g/sec
Carbon Monoxide (CO) <sup>1</sup>	29.4	26.3	31.4	29.0	100 ppm @ 7% O <sub>2</sub> (1 hour rolling average)
Destruction Efficiency					
MCB, %	> 99.99972	> 99.99972	> 99.99972	> 99.99972	99.99%
TCE, %	> 99.99995	> 99.99995	> 99.99995	> 99.99995	99.99%
Volatile Organics	<u> </u>				
Semivolatile Organics				****	See Section 6 for detailed test results
Chlorinated Dioxins and Furans <sup>2</sup>	2.39E-13	9.63E-13	4.36E-11	1.49E-11	2.0E-7 g/sec
Nitrogen Oxides as NO2, lb/hr1	6.60	5.48	5.07	5.72	<u>-</u>
Total Hydrocarbon as propane, lb/hr	0.099	0.099	0.099	0.099	<u>4</u>

FURNACE

Table 3-3 Summary of Process Operating Conditions during the Trial Burn - Mode B

Parameter	-	Current		Mode B						
		Limit	Run 1	Run 2	Run 3	Average	Limit <sup>2,3</sup>			
Hazardous Waste Feed Rate, It	os/min	464.81	269.96	258.69	262.15	263.60	313.26			
	Total Spike Stream Feed Rate, Ib/min		11.55	I1.55	11.55	11.55	313.20			
Bucket/Bag Feed Rate, per hou	20	0	0	0	0	20				
Minimum Main Gas Blower Se		5.5	8.41	9.56	8.42	8.80	5.5			
Sulfuric Acid Production, ton/		38.28	29.34	30.53	30.36	30.08	38.28			
Combustion Chamber Tempera	ature, °F (min)	1884	1889.39	1869.13	1864.44	1874.32	1874.32			
Combustion Gas Velocity, AC		186,137	144,309	135,561	133,579	137,816				
Combustion Gas Velocity, AC		186,137	148,269	139,241	137,446	141,652	171,168			
Hourly Rolling Average for Co		100	65.24	56.22	53.39	58.28	100			
Combustion Chamber Pressure		0.0	-1.79	-1.14	-1.23	-1.39	0.0			
ESP Inlet Temperature, °F	<u> </u>	120	91.76	94.29	94.10	93.38	120			
Pressure Drop Across Demiste	r, in H <sub>2</sub> O	3	14.98	14.82	14.88	14.89	3			
	ESP1	50	69.14	69.68	69.55	69.46	50			
Total Power to ESP, KV	ESP2	50	70.82	73.10	71.70	71.87	50			

(1)

Buckets/Bags were not fed during the Trial Burn.

Proposed limits are based upon averages of Mode A and/or Mode B values where applicable.

Proposed hazardous waste feed rate limit includes all waste feeds and spike streams. (2)

#### TABLE 6-5 RHODIA - ROUSTON, TX SUMMARY OF PARTICULATE, HCL2, CL2, NOX, and THC TEST DATA AND TEST RESULTS

TEST BATA:	٠.		2		3	
Test run number	1		Unit 2		,	
Location			Mode B			
Condition	10-19-10		10-20-10		10-20-10	
Test date	1200-1445		1030-1253		1505-1817	
Test time period	1200-14-0	,	(0)0"1273		1505-1411	
SAMPLING DATA:						
Sampling duration, min.	120		120		120	
Nozzle diameter, in.	0.272		0.272		0,272	
Cross sectional nozzle area, sq.fl.	0,000464		D,000404		0.000104	
Borometrie pressure, in. Hg	29.72		29.71		29.71	
Avg. mifice press. diff., in B2O	1.64		1.57		1.58	
Avg. dry gas meter temp., deg F	90.6		87,3		96.6	
Avg. abs. dry gas meter temp., deg. R	351		547		557	
Total liquid collected by train, ml	9.3		8.6		3.5	
Std. vol. of 1120 vapor coll., cu.fl.	0.4		0.4		0.2	
Dry gas meter calibration factor	0.986.0		0.9860		0,9860	
Sample vol. at meter cond., def	86.947		84.599		86.540	
Sample vol. at std. cond., dscf(1)	81.963		80.186		80.654	
Percent of isokinetic sampling	100,4		100.1		101.0	
GAS STREAM COMPOSITION DATA:						_
CO2, % by volume, dry basis	8.3		8.2		8.2	- CO2
O2, % by volume, dry basis	8.0		8.1		8.1	- 44
N2, 34 by volume, dry basis	83.7		83.7		83.7	
Molecular we, of dry gas, lib/lb mole	29.65		29.64		29.64	
H2O vapor in gas stream, prop. by vol.	0.005		0.005		0.002	
Mole fraction of dry gas	0.995		0.995		0.998	
Molecular with of weights, ib/lb mole	29.6		29,6		29.6	
Motecust wit of wel Bas, tarlo mote	****		4			
GAS STREAM VELOCITY AND VOLUMETRIC FLOW	DATA:					
Statle pressure, in. 1120	6.10		6.10		6.00	
Static pressure, in. Hg	0.449		0,449		0.441	
Absulute pressure, in. Hg	30,17		30.16		30.15	
Avg. temperature, deg. F	119		121		123	
Avg. absolute temperature, deg.R	\$79		581		583	
Pitot tube coefficient	0.84		68.0		0.84	
Total number of traverse points	12		12		[2	
Avg. gas stream velocity, it isee.	30.7		30.3		30.2	
Stack/duct cross sectional area, sq.ft.	28.274		28 274		28.274	
Avg. gas stream volumetric flow, wacfmin.	52146		51352		51218	
Avg. gas stream volumetric flow, diet/min.	47656		46784		46620	
Average SCFM (All tests per run)	48267		45119		47843	
PARTICULATE LABORATORY REPORT DATA						
	0,0045		0.0037		0.0027	
Front half accione riose, g	0.0001		0.0010		0.0011	
Filter, g	0.0001		2.00.0		•••	
Total particulate catch weight, g	0.0046		0.0047		0.0038	
PARTICULATE EMISSIONS						
Cone., gr/dscf (uncorrected)	0,00087		0.00090		0.00073	
Cone., gr/dsef û, 7% O;	0.00093		0.00098		0.00079	
Emission rate. lbs/hr	6.35378		0.36272		0.29054	
Chilippida lafe, wo.m						
CI, LABORATORY REPORT DATA						
Total Cl <sub>2</sub> , mg	< 0.14	<	0.18	<	0.14	
CI <sub>1</sub> EMISSIONS						
Concentration, lbs/dsef	< 3.77E-09		4,81E-09	<	3.69E-89	
Concentration, ppm's	< 0.02	<	6.03	<	0.02	
Concentration, ppm/v & 755 O2	< 0.02	<	0.03	<	0.02	
Mass rate, Ibs/hr	< 0.01	<	0.01	<	0.01	
Mass rate, g/sec	< 0.0014	<	0.0017	<	0.0013	
HCL LABORATORY REPORT DATA						
Total HCI, mg	1.370		1.470		2.530	
HCI EMISSIONS						
Concentration, hes/decf	3.68E-08		4.04₹-08		6.921:-08	
Concentration, ppnt/v	0,39		0.43		0.73	
Concentration, ppm/v @. Ph O2	0.42		0.46		0.79	
Mass rate, lbs/hr	0.11		0.11		0.19	
Mass rate, gisec	0.013		U.014		0.024	
NOX AND THE EMISSIONS	19.1		15.9		)4.8	
NOX, ppm (as NO2)	0.3		0.3		0.3	
THC, ppm (as propane)	0.3		9.7			
NOX, livin (as NO2)	6.60		5.48		5.07	
THC. lb/hr (as propane)	0,099		0.099		0.099	
	02 inch se 65a 2768mm	uat				ひかいないりかいない

<sup>(1)</sup> Standard conditions = 68 deg. F. (20 deg. C.) and 29.92 inches Hg (760mm Hg).

**BASELINE EMISSION CALCULATION** 

# **Baseline Emission Calculation**

		Acid &		N6π - 24-	PM/	PM/PM <sub>10</sub> /		S0; 24		H <sub>2</sub> SO, 24		CO72.
		Production		month	PM <sub>10</sub> /	24-month	66	month	H <sub>2</sub> SO <sub>4</sub>	month Rolling	co.	Rolling
		Rate	NOx	Rolling	PM <sub>2.5</sub>	Rolling	$SO_2$	Rolling		Average	(ton)	Average:
¥Year		(ton/month)	a(ton)	Average		Average	(ton)	Average	0.61	Average	4,462.06	
	Jan	12,252	3.19		0.36		199.20	-	0.75		5,439.92	
	Feb	14,937	3.89		0.44		209.40 268.30		0.73		4,682.76	
	Mar	12,858	3.35		0.38		271.90		0.59		4,269.41	
	Apr_	11,723	3.06		0.35		268.80		0.64		4,660.91	
	May	12,798	3.34		0.38		267.80	<del></del>	0.51		3,734.05	
2001	Jun_	10,253	2,67 3,74		0.30		336.20		0.72		5,220.67	
	Jul	14,335			0.43		286.40		0.70		5,114.69	
	Aug	14,044	3.66 2.74		0.42	····	250.30		0.53		3,834.93	
	Sep	10,530 10,245	2.67		0.30		120.50		0.51		3,731.13	
	Oct	15,356	4.00		0.46		303.60		0.77		5,592.51	
	Nov Dec	13,782	3.59		0.41	<del></del>	255.20		0.69		5,019.28	
	Jan	13,782	3.64		0.41		290.90		0.70		5,079.37	
	Feb	10,841	2.83		0.32		252.20		0.54	-	3,948.19	
1	Mar	13,796	3.60		0.41		300.20		0.69		5,024.37	
	Apr	11,068	2.88		0.33		188.80		0.55		4,030.86	
	May	14,602	3.81		0.43		250.20		0.73		5,317.91	
	Jun	11,486	2.99		0.34		207.80		0.57		4,183.09	
2002	Jul	15,614	4.07		0.46		262.90		0.78		5,686.47	
	Aug	16,976	4.42		0.50		245.00		0.85		6,182.50	
	Sep	14,281	3.72		0.42		262.05		0.71		5,201.01	<u> </u>
	Oct	15,846	4.13		0.47		240.30		0.79		5,770.97	
	Nov	13,935	3.63		0.41		246.14		0.70		5,075.00	
1	Dec	13,331	3.47	3.46	0.40	0.39	239.00	250.96	0.67	0.66	4,855.03	4838.21
	Jan	12,369	3.22	3.46	0.37	0.39	222.10	251.92	0.62	0.66	4,504.67	4839.99
	Feb	10,386	2.71	3.41	0.31	0.39	256.10	253.86	0.52	0.66	3,782.48	4770.93
	Mar	14,804	3.86	3.44	0.44	0.39	317.00	255.89	0.74	0.66	5,391.48	4800.46
	Apr	4,449	1.16	3.36	0.13	0.38	154.90	251.02	0.22	0.64	1,620.28	4690.08
	May	14,613	3.81	3.38	0.43	0.38	184.90	247.52	0.73	0.65	5,321.92	4717.62
2002	Jun	21,059	5.49	3.49	0.63	0.40	248.60	246.72	1.05	0.67	7,669.49	4881.60
2003	Jul	17,201	4.48	3.52	0.51	0.40	288.30	244.72	0.86	0.68	6,264.44	4925.09 4985.00
	Aug	17,992	4.69	3.57	0.53	0.41	230.10	242.38	0.90	0.68	6,552.52	5099.32
	Sep	18,064	4.71	3.65	0.54	0.42	237.96	241.86	0.90	0.70	6,578.74	5212.52
	Oct	17,705	4.61	3.73	0.53	0.43	340.60	251.04	0.89	0.72	6,448.00	
	Nov	17,180	4.48	3.75	0.51	0.43	333.20	252.27	0.86	0.72	6,256.80	5240.20 5156.94
	Dec	8,295	2.16	3.69	0.25	0.42	270.20	252.89	0.41	0.71	3,020.96	5195.53
	Jan	16,490	4.30	3.72	0.49	0.42	309.50	253.67	0.82	0.71	6,005.50 2,472.49	5134.04
	Feb	6,789	1.77	3.67	0.20	0.42	143.80	249.15	0.34	0.70	6,011.70	5175.18
	Mar	16,507	4.30	3.70	0.49	0.42	328.00	250.31	0.83	0.71	7,371.95	5314.39
	Apr	20,242	5.28	3.80	0.60	0.43	338.60	256.55	1.01	0.73	6,077.61	5346.05
	May	16,688	4.35	3.83	0.50	0.44	283.90	257.96	0.83	0.75	6,789.61	5454.65
2004	Jun	18,643	4.86	3.90	0.55	0.44	247.60	259.61	0.93	0.75	5,185.71	5433.79
2007	Jul	14,239	3.71	3.89	0.42	0.44	317.50	261.89 264.67	0.71	0.73	4,953.72	5382.59
	Aug	13,602	3.55	3.85	0.40	0.44	311.70	268.21	0.69	0.74	5,052.05	5376.38
ļ	Sep_	13,872	3.62	3.85	0.41	0.44	347.10	273.98	0.87	0.74	6,306.69	5398.70
1	Oct	17,317	4.51	3.86	0.51	0.44	378.60	276.59	0.87	0.74	5,205.38	5404.13
	Nov	14,293	3.73	3.87	0.42	0.44	309.00 285.60	278.54	0.71	0.75	6,692.00	5480.67
	Dec	18,375	4.79	3.92	0.55	0.45	200.00	1 210.54	1	3.75		

# **Baseline Emission Calculation**

				NOx	PM/	PM/PM <sub>10</sub> /		SO <sub>2</sub>		H,SO <sub>4</sub>	15 B F	CO <sub>2</sub>
		Acid .		24	PM <sub>10</sub> /	24-month		month		month		24-month
		Production		month Rolling	PM <sub>2.5</sub>	Rolling	$SO_2$	Rolling	H,SO4	Rolling	. co,	Rolling
		Rate (ton/month)	NOx (ton)	Average	(ton)	Average	-(ton)	Average	(ton)	Average	(ton)	Average
Vear	Secretaria Assistante and Secretaria	17,757	4.63	3.98	0.53	0.45	336.00	283.28	0.89	0.76	6,466.93	5562.44
	Jan Feb	3,632	0.95	3.91	0.11	0.45	98.20	276.70	0.18	0.75	1,322.74	5459.95
	Mar	19,409	5.06	3.96	0.58	0.45	347.60	277.98	0.97	0.76	7,068.58	5529.83
	Apr	18,838	4.91	4.11	0.56	0.47	320.40	284.87	0.94	0.79	6,860.62	5748.17
	May	14,893	3.88	4.12	0.44	0.47	263.70	288.16	0.74	0.79	5,423.89	5752.42
	Jun	19,562	5.10	4.10	0.58	0.47	333.90	291.71	0.98	0.79	7,124.30	5729.71
2005	Jul	19,662	5.12	4.13	0.58	0.47	369.10	295.08	0.98	0.79	7,160.72	5767.05
	Aug	19,513	5.09	4.14	0.58	0.47	354.10	300.24	0.98	0.79	7,106.45	5790.13
	Sep	13,449	3.51	4.09	0.40	0.47	214.00	299.25	0.67	0.79	4,898.00	5720.10
	Oct	15,493	4.04	4.07	0.46	0.46	380.20	300.90	0.77	0.78	5,642.41	5686.53
	Nov	18,345	4.78	4.08	0.54	0.47	370.50	302.45	0.92	0.78	6,681.08	5704.21
	Dec	21,376	5.57	4.22	0.63	0.48	324.20	304.70	1.07	0.81	7,784.94	5902.71
	Jan	20,466	5.33	4.27	0.61	0.49	352.50	306.49	1.02	0.82	7,453.53	5963.05
1	Feb	8,662	2.26	4.29	0.26	0.49	205.40	309.06	0.43	0.82	3,154.62	5991.47
	Mar	14,677	3.83	4.27	0.44	0.49	350.90	310.01	0.73	0.82	5,345.23	5963.70
	Apr	18,579	4.84	4.25	0.55	0.48	387.90	312.07	0.93	0.82	6,766.30	5938.46
	May	18,541	4.83	4.27	0.55	0.49	382.60	316.18	0.93	0.82	6,752.46	5966.58 5952.54
2006	Jun	17,718	4.62	4.26	0.53	0.49	361.20	320.91	0.89	0.82	6,452.73	6021.42
2006	Jul	18,778	4.89	4.31	0.56	0.49	366.80	322.97	0.94	0.83	6,838.77	6069.31
	Aug	16,758	4.37	4.34	0.50	0.50	361.50	325.04	0.84	0.83	6,103.11	6145.05
	Sep	18,863	4.92	4.40	0.56	0.50	372.20	326.09	0.94	0.84	6,869.73	6141.29
	Oct	17,069	4.45	4.40	0.51	0.50	370.30	325.74	0.85	0.84	6,216.37 6,477.86	6194.31
	Nov	17,787	4.64	4.43	0.53	0.51	369.55	328.26	0.89	0.85	5,343.04	6138.10
	Dec	14,671	3.82	4.39	0.44	0.50	372.90	331.90	0.73	0.83	4,034.87	6036.76
	Jan	11,079	2,89	4.32	0.33	0.49	190.00	325.82	0.92	0.86	6,701.11	6260.86
	Feb	18,400	4.80	4.48	0.55	0.51	290.40	333.83	0.92	0.86	6,788.51	6249.19
	Mar	18,640	4.86	4.47	0.55	0.51	350.90	333.96 332.51	0.94	0.86	6,878.83	6249.95
	Apr	18,888	4.92	4.47	0.56	0.51	285.50 270.29	332.79	1.05	0.87	7,616.32	6341.30
	May	20,913	5.45	4,54	0.62	0.52	361.20	333.92	0.95	0.87	6,915.25	6332.59
2007	Jun	18,988	4.95	4.53	0.56	0.52 0.52	278.90	330.16	1.00	0.87	7,262.33	6336.83
1 200.	Jul	19,941	5.20	4.54	0.59	0.52	278.90	327.03	0.98	0.87	7,147.61	6338.54
1	Aug	19,626	5.12	4.54	0.58	0.52	256.10	328.79	0.83	0.88	6,060.13	6386.96
	Sep	16,640	4.34	4.57 4.63	0.49	0.53	299.80	325.44	1.03	0.89	7,511.07	6464.82
	Oct	20,624	5.38	4.63	0.59	0.53	271.60	321.31	1.00	0.89	7,248.49	6488.47
	Nov	19,903	5.19 5.18	4.63	0.59	0.53	299.70	320.29	0.99	0.89	7,234.65	6465.54
	Dec	19,865 20,293	5.29	4.63	0.60	0.53	305.10	318.32	1.01	0.89	7,390.52	6462.91
	Jan	5,941	1.55	4.60	0.18	0.52	109.90	314.34	0.30	0.88	2,163.66	6421.62
	Feb	20,794	5.42	4.66	0.62	0.53	341.70	313.96	1.04	0.89	7,572.98	6514.45
	Mar	22,152	5.77	4.70	0.66	0.54	318.40	311.06	1.11	0.90	8,067.55	6568.66
	Apr	21,004	5.47	4.73	0.62	0.54	326.20	308.71	1.05	0.91	7,649.46	6606.04
	May Jun	14,109	3.68	4.69	0.42	0.53	264.90	304.70	0.71	0.90	5,138.37	6551.27
2008	Jul	17,863	4.66	4.68	0.53	0.53	320.20	302.76	0.89	0.90	6,505.54	6537.39
	Aug	18,676	4.87	4.70	0.55	0.54	323.80	301.19	0.93	0.90	6,801.62	6566.49
	Sep	10,170	2.65	4.61	0.30	0.52	123.60	290.83	0.51	0.88	3,703.82	6434.58
	Oct	18,350	4.78	4.62	0.55	0.53	311.97	288.40	0.92	0.89	6,682.90	6454.02
	Nov	22,364	5.83	4.67	0.66	0.53	313.50	286.06	1.12	0.90	8,144.76	6523.47
1	Dec	17,713	4.62	4.70	0.53	0.54	305.90	283.27	0.89	0.90	6,450.91	6569.64

## **Baseline Emission Calculation**

				ΝΟτ		PMAPM,		š0,		H-SO,		
		Acid		24-	PM/	PM,		24		24-		€ CO <sub>2</sub>
		Production		month	PM <sub>10</sub> /	24-month		month		month		24-month
		Rate	NOx	Rolling	PM2	Rolling	SO,	Rolling	H <sub>i</sub> SO <sub>2</sub>	Rolling	CO2	Rolling
Year	Month	(ton/month)	(ton)	Average	(ton)	Average	(ton)	Average	(ton)	Average	(ton)	Average
and the same of	Jan	15,671	4.08	4.75	0.47	0.54	317.60	288.59	0.78	0.91	5,707.23	6639.32
-	Feb	16,778	4.37	4.73	0.50	0.54	298.70	288.93	0.84	0.91	6,110.39	6614.70
	Mar	17,630	4.60	4.72	0.52	0.54	298.50	286.75	0.88	0.91	6,420.68	6599.38
	Apr	16,850	4.39	4.70	0.50	0.54	311.40	287.83	0.84	0.90	6,136.61	6568.45
}	May	16,042	4.18	4.65	0.48	0.53	242.60	286.67	0.80	0.89	5,842.35	6494.54
	Jun	16,534	4.31	4.62	0.49	0.53	307.50	284.44	0.83	0.89	6,021.53	6457.30
2009	Jul	16,407	4.28	4.58	0.49	0.52	328.90	286.52	0.82	0.88	5,975.28	6403.67
1	Aug	17,759	4.63	4.56	0.53	0.52	348.00	289.40	0.89	0.88	6,467.66	6375.34
	Sep	15,595	4.06	4.55	0.46	0.52	338.00	292.81	0.78	0.87	5,679.55	6359.48
	Oct	6,844	1.78	4.40	0.20	0.50	132.30	285.83	0.34	0.84	2,492.52	6150.38
	Nov	8,335	2.17	4.28	0.25	0.49	175.90	281.84	0.42	0.82	3,035.53	5974.84
	Dec	17,028	4,44	4.25	0.51	0.48	355.58	284.17	0.85	0.81	6,201.44	5931.79
	Jan	14,728	3.84	4.18	0.44	0.48	329.70	285.20	0.74	0.80	5,363.80	5847.34
	Feb	15,284	3.98	4.29	0.45	0.49	297.80	293.03	0.76	0.82	5,566.29	5989.12
	Mar	18,813	4.90	4.26	0.56	0.49	361.10	293.84	0.94	0.82	6,851.52	5959.05
	Apr	15,777	4.11	4.20	0.47	0.48	342.22	294.83	0.79	0.80	5,745.84	5862.32
	May	6,290	1.64	4.04	0.19	0.46	218.55	290.34	0.31	0.77	2,290.76	5639.04
2010	Jun	7,675	2.00	3.97	0.23	0.45	242.14	289.39	0.38	0.76	2,795.16	5541.40
2010	Jul	17,939	4.68	3.97	0.53	0.45	392.88	292.42	0.90	0.76	6,533.22	5542.56
	Aug	23,427	6.11	4.02	0.70	0.46	396.36	295.45	1.17	0.77	8,531.89	5614.65
	Sep	5,687	1.48	3.97	0.17	0.45	173.87	297.54	0.28	0.76	2,071.15	5546.62
	Oct	16,703	4.35	3.95	0.50	0.45	364.40	299.73	0.84	0.76	6,083.08	5521.63
	Nov	16,436	4.28	3.89	0.49	0.44	337.77	300.74	0.82	0.75	5,985.84	5431.68
	Dec	16,590	4.32	3.88	0.49	0.44	378.66	303.77	0.83	0.74	6,041.92	5414.63
	Jan	20,973	5.47	3.93	0.62	0.45	401.20	307.25	1.05	0.75	7,638.17	5495.09 5436.67
2011	Feb	12,928	3.37	3.89	0.38	0,44	260.91	305.68	0.65	0.75	4,708.26	· · · · · · · · · · · · · · · · · · ·
2011	Mar	3,618	0.94	3.74	0.11	0.43	94.73	297.19	0.18	0.72	1,317.64	5224.04
	Apr	22,366	5.83	3.80	0.66	0.43	323.80	297.70	1.12	0.73	8,145.49	5307.74 6,639.32
Maximu				4.75		0.54		333.96		0.91		79,671.80
Baseline	tpy (=ma	ximum * 12)		57.02		6.50		4,007.58		10.94		19,0/1.80

Trinity Consultants 114402.0054 June 2011

### PROJECT INCREASE AND NETTING ANALYSIS

### **BASELINE ACTUAL EMISSIONS**

EPN	Emission Unit Description	H <sub>2</sub> SO <sub>4</sub> (tpy)	PM (tpy)	PM <sub>10</sub> (tpy)	PM <sub>2.5</sub> (tpy)	SO <sub>2</sub> (tpy)	NOx (tpy)	CO <sub>2</sub> (tpy)
104	Regeneration Unit No. 2 Stack	10.94	6.50	6.50	6.50	4007.58	57.02	79,671.80

### POTENTIAL/PROPOSED EMISSIONS

EPN	Emission Unit Description	H <sub>2</sub> SO <sub>4</sub> (tpy)	PM (tpy)	PM <sub>10</sub> (tpy)	PM <sub>2,5</sub> (tpy)	SO <sub>2</sub> (tpy)	NOx (tpy)	CO <sub>2</sub> (tpy)
104	Regeneration Unit No. 2 Stack	20.99	12.47	12.47	12.47	377.78	61.95	152,869.03
CATSCNR2	Catalyst screening for Regen 2	_	7.17E-04	7.17E-04	7.17E-04	-	-	-
Total	Regeneration Unit No. 2 Stack and Catalyst screening for Regen 2	20.99	12.47	12.47	12.47	377.78	61.95	152,869.03

## POTENTIAL EMISSIONS MINUS BASELINE ACTUAL EMISSIONS

EPN	Emission Unit Description	H <sub>2</sub> SO <sub>4</sub> (tpy)	PM (tpy)	PM <sub>10</sub> ( <b>tpy</b> )	PM <sub>2.5</sub> (tpy)	SO <sub>2</sub> (tpy)	NOx (tpy)	CO <sub>2</sub> (tpy)
104	Regeneration Unit No. 2 Stack	10.05	5.97	5.97	5.97	-3629.80	4.92	73,197.22
	ecreases de minimis Level A de minimis level exceeded ?	10.05 7 Yes	5.97 25 <b>No</b>	5.97 15 <b>No</b>	5.97 10 <b>No</b>	-3629.80 40 <b>No</b>	4.92 5 <b>No</b>	73,197.22 75,000 <b>No</b>

### HISTORICAL PROJECT INCREASE

Permit 4802, Project 064402.0005, 2/2006 amendment

Tank Number	Turnover, gallons/year	SCF/year
78	6,500,000	13,155,120

SCF/year came from 044402.0134

Use the same logic for 12/2006 (Project 064402.0109) for estimating scf/year.

### EPN 104, Furnace Stack

120 MMBtu/hr

Based on application dated 12/27/2004, Project 044402.0134

**Furnace Emission Factor** 

Pollutant	Factor*, lb/MMBtu
NOx	0.31
CO	0.0475
H2SO4	0.05
SO2	10.42
PM/PM10/PM2.5	0.028

<sup>\*</sup>These are estimated factors based on the ratio of lb/hr emission rate to heat input of 120 MMBtu/hr.

 $NOx\ tpy = 89.37\ BTU/scf*\ Vol\ scf/yr\ *0.3\ lb\ NOx/MMBtu\ *\ MMBtu/10E6\ Btu\ *\ ton/2000lb\ Annex ton/2000lb\ Ann$ 

### Emission Rate Increases from EPN 104

Pollutant	Increase, tpy
NOx	0.1822
CO	0.0279
H2SO4	0.0297
SO2	6.1232
PM/PM10/PM2.5	0.0165

Permit 4802, Project 064402.0109, 12/2006 amendment

Tank Number	Old Turnover, galions/year	New Turnover, gallons/year
48	2,578,000	10,000,000
49	8,590,900	28,000,000
56	8,080,600	10,000,000
78	6,500,000	6,500,000
53	-	2,800,000

Prior to 12/2006 Rhodia Design Analysis for Working Losses for 48,49,56

141	52220	scf/vear
141	323ZU	sci/vear

Based on Project 064402.0109, Calcs-detail-rev6.xls

Tank	Ratio of Working Loss based on past turnovers, scf	Kn Factor	Calculated Working Loss based on New Turnovers, scf	
48	1,895,357	1	7,352,046	
49	6,316,069	0.516	10,612,022	
56	5,940,894	1	7,352,046	
53		1	2,058,573	
			07 074 (0)	

27,374,686

Breathing loss

11957400 scf/year

Hazardous tank truck purging

(550 trucks/year) x (5,000 gallons/truck) x (20% VOC) x (0.1337 ft3/gallon) =

73535 scf/year

Source	Past Loss, scf	Proposed Loss, scf
Spent Acid Tanks	14,152,320	39,332,086
Haz Purging	0	73,535

Heating value

Heating value				<u> </u>	<u></u>	Net	max	avg
						Heating	Heating	Heating
						Value	value	value
Pollutant	max wt%	avg wt%	MW	max mol%	avg mol%	BTU/scf	BTU/scf	BTU/scf
Ethylene	0.10%	0.07%	28	0.12%	0.08%	1471	1.765	1.177
Propane	1.84%	1.28%	44	1.42%	0.92%	2272	32.262	20.902
Iso-Butane	1.43%	1.00%	58	0.83%	0.54%	2956	24.535	15.962
n-Butane	4.31%	2.99%	58	2.45%	1.59%	2956	72,422	47.000
non-specified (as								
Iso-Pentane)	0.38%	0.27%	72	0.18%	0.12%	3605	6.489	4.326
902	25 30%	17.55%		13.37%	8.68%	1	137.47	89.37

Values are based on P084402\0064\calc-EPN170-20100224.xlsx

Avg VOC Conc Avg VOC MW

3.25% 1.749

EPN 104, Furnace Stack

120 MMBtu/hr

Based on application dated 12/27/2004, Project 044402.0134

Furnace Emission Factor

Pollutant	Factor*, lb/MMBtu
NOx	0.31
co	0.0475
H2SO4	0.0505
SO2	10.42
PM	0.028

<sup>\*</sup>These are estimated factors based on the ratio of lb/hr emission rate to heat input of 120 MMBtu/hr.

 $NOx\ tpy = 89.37\ BTU/scf*\ Vol\ scf/yr\ *0.3\ lb\ NOx/MMBtu\ *\ MMBtu/10E6\ Btu\ *\ ton/2000lb\ Angle of the control of the$ 

Emission Rate Increases from EPN 104

Pollutant	Past, tpy	Proposed, tpy	Increase, tpy		
NOx	0.1960	0.5458	0.350		
co	0.0300	0.0836	0.054		
H2SO4	0.0319	0.0889	0.057		
SO2	6.5873	18.3417	11.75		
PM	0.0178	0.0496	0.03		

#### Vapor Combustors EPN 120 and 170

Vapor Combustor Emission Factors

Pollutant	Factor	Unit	
voc	98%	VOC DRE	Flare efficiency
NOx	0.0641	lb/MMBtu	"Flares and Vapor Oxidizers, October 2000".
co	0.5496	lb/MMBtu	"Flares and Vapor Oxidizers, October 2000".
HC1	0.1638	of VOC	This is based on Rhodia's estimation
Cl2	0.0319	of VOC	This is based on Rhodia's estimation
SO2	99.90%		

EPN 170, vapor combustor 2

When furnace is down 15% of the time (1314 hrs/yr), the emissions are routed to EPN 170.

15% of the total losss from Spent Tanks

Past Loss, scf	Proposed Loss, scf
2,122,848	5,899,813

CO or NOx, tpy = 89.37 Btu/scf \* vol scf/year \* MMBtu/10E6 Btu \* 1b/MMBtu \* ton/2000 lb VOC, tpy = mol%\*14.7 psia \* scf/year \*1.749 lb/lbmole \* 1/520R \* lbmole-R/10.73 psia-ft3 \* (1-0.98)\* ton/2000 lb SO2, tpy = mol%\*14.7 psia \* scf/year \* 64 lb/lbmole \* 1/520R \* lbmole-R/10.73 psia-ft3 \* (1-0.999)\* ton/2000 lb

Emission Rate Increases from EPN 170

Pollutant	Past, tpy	Proposed, tpy	Increase, tpy
NOx	0.0061	0.0169	0.011
co	0.0521	0.1449	0.093
VOC	0.0032	0.0088	0.006
SO2	0.0155	0.0432	0.028

Vapor Combustor EPN 120

The new annual tank truck numbers is 550 truck/year. However, the old number is not known. To be conservative, assume past emissions are zero. Proposed emissions are either MAERT limit or emissions associated with the tank truck.

Emission Rate Increases from EPN 120 during furnace MSS

Pollutant	Past, tpy	Proposed, tpy	Increase, tpy
NOx	0	0.32	0.32
co	0	0.27	0.27
VOC	0	0.12	0.12

RBLC SEARCH RESULTS

## n RBLC - Acid Mist

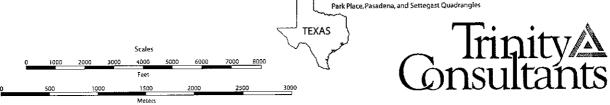
	<u> </u>				
THROUGHPUT		POLLUTANT	CONTROL METHOD DESCRIPTION	PERCENT EFFICIENCY	
550	T/D	Sulfuric Acid (mist, vapors, etc)	BRINK MIST ELIMINATOR	99.9	
3,000	T/D	Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATORS	99	
3,400	T/D	Acid Mist / Gases	MIST ELIMINATORS	99	
3,000	t/d	Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATORS	99	
		Sulfuric Acid (mist, vapors, etc)	BROWNIAN DIFFUSION MIST ELIMINATION CANDLES IN BOTH THE INTERPASS ABSORBER TOWER AND THE FINAL ABSORBER TOWER	0	
2,300	T/D	Sulfuric Acid (mist, vapors, etc)	BROWNIAN DIFFUSION CANDLES	0	
2,000	T/D	Sulfuric Acid (mist, vapors, etc)	CONDENSERS, WET ELECTROSTATIC PRECIPITATORS, AND HYDROGEN PEROXIDE SCRUBBERS	0	
		Sulfuric Acid (mist, vapors, etc)	FIXED ROOFS, SUBMERGED FILL PIPES, AND NITROGEN BLANKET	0	
1,800	T/D	Sulfuric Acid (mist, vapors, etc)	Vertical tube mist eliminators (aka candles)	0	
1,800	T/D	Sulfuric Acid (mist, vapors, etc)	Vertical tube mist eliminators (aka candles)	0 .	
1,850	T/D	Sulfuric Acid (mist, vapors, etc)	VERTICAL TUBE MIST ELIMINATOR	0	
400	T/D	Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATOR	0	
400	T/D	Sulfuric Acid (mist, vapors, etc)	MIST ELMINATOR	0	
		Sulfuric Acid (mist, vapors, etc)	SCRUBBER	0	

# n RBLC - Acid Mist

THROUGHPUT	POLLUTANT	CONTROL METHOD DESCRIPTION	PERCENT EFFICIENCY
	Sulfuric Acid (mist, vapors, etc)	NONE INDICATED	0
	Sulfuric Acid (mist, vapors, etc)		0
	Sulfuric Acid (mist, vapors, etc)		0
	Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATOR	0
2,600 T/D	Sulfuric Acid (mist, vapors, etc)	MIST ELIMINATOR	99
	Sulfuric Acid (mist, vapors, etc)	H2SO4 MIST BACT IS USE OF FILTER MEDIA TO CAPTURE ACID MIST.	99

LAND USE DETERMINATION





## U.S. CENSUS BUREAU DATA FOR HOUSTON

State & County QuickFacts

# Houston (city), Texas

People QuickFacts	Houston	Texas
Population, 2006 estimate	2,144,491	23,507,783
Population, percent change, April 1, 2000 to July 1, 2006	8.8%	12.7%
Population, 2000	1,953,631	20,851,820
Persons under 5 years old, percent, 2000	8.2%	7.8%
Persons under 18 years old, percent, 2000	27.5%	28.2%
Persons 65 years old and over, percent, 2000	8.4%	9.9%
Female persons, percent, 2000	50.1%	50.4%
White persons, percent, 2000 (a)	49.3%	71.0%
Black persons, percent, 2000 (a)	25.3%	11.5%
American Indian and Alaska Native persons, percent, 2000 (a)	0.4%	0.6%
Asian persons, percent, 2000 (a)	5.3%	2.7%
Native Hawaiian and Other Pacific Islander, percent, 2000 (a)	0.1%	0.1%
Persons reporting two or more races, percent, 2000	3.1%	2.5%
Persons of Hispanic or Latino origin, percent, 2000 (b)	37.4%	32.0%
Living in same house in 1995 and 2000, pct 5 yrs old & over	46.9%	49.6%
Foreign born persons, percent, 2000	26.4%	13.9%
Language other than English spoken at home, pct age 5+, 2000	41.3%	31.2%
High school graduates, percent of persons age 25+, 2000	70.4%	75.7%
Bachelor's degree or higher, pct of persons age 25+, 2000	27.0%	23.2%
Mean travel time to work (minutes), workers age 16+, 2000	27.4	25.4
Housing units, 2000	782,009	8,157,575
Homeownership rate, 2000	45.8%	63.8%
Median value of owner-occupied housing units, 2000	\$79,300	\$82,500
Households, 2000	717,945	7,393,354
Persons per household, 2000	2.67	2.74
Median household income, 1999	\$36,616	\$39,927
Per capita money income, 1999	\$20,101	\$19,617
Persons below poverty, percent, 1999	19.2%	15.4%

Business QuickFacts	Houston	Texas
Wholesale trade sales, 2002 (\$1000)	122,727,158	397,405,111
Retail sales, 2002 (\$1000)	25,813,909	228,694,755
Retail sales per capita, 2002	\$12,889	\$10,528
Accommodation and foodservices sales, 2002 (\$1000)	4,155,251	29,914,774
Total number of firms, 2002	187,124	1,734,509
Black-owned firms, percent, 2002	11.3%	5.1%
American Indian and Alaska Native owned firms, percent, 2002	1.0%	0.9%
Asian-owned firms, percent, 2002	8.5%	4.5%
Hispanic-owned firms, percent, 2002	22.3%	18.4%
Native Hawaiian and Other Pacific Islander owned firms, percent, 2002	S	0.1%

27.0%

27.6%

Women-owned firms, percent, 2002	27.6%	27.0%	
Geography QuickFacts	Houston	Texas	
Land area, 2000 (square miles)	579	261,797	
Porcons per square mile 2000	3,371.7	79.6	
FIPS Code	35000	48	
Counties			

(a) includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

D: Suppressed to avoid disclosure of confidential information

F: Fewer than 100 firms

FN: Footnote on this item for this area in place of data

NA: Not available

S: Suppressed; does not meet publication standards

X: Not applicable

Z: Value greater than zero but less than half unit of measure shown

Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, 2000 Census of Population and Housing, 1990 Census of Population and Housing, Small Area Income and Poverty Estimates, County Business Patterns, 2002 Economic Census, Minority- and Women-Owned Business, Building Permits, Consolidated Federal Funds Report, Census of Governments Last Revised: Wednesday, 08-Jul-2009 18:32:24 EDT

### **AERSURFACE RESULTS**

### AERSURFACE RESULT - AVERAGE SURFACE MOISTURE

\*\* GENERATED BY AERSURFACE, DATED 08009 \*\* CENTER UTM EASTING (METERS): 280235.0 \*\* CENTER UTM NORTHING (METERS): 3289955.0 \*\* UTM ZONE: 15 DATUM: NAD83 \*\* STUDY RADIUS (KM) FOR SURFACE ROUGHNESS: 1.0 \*\* AIRPORT? N, CONTINUOUS SNOW COVER? N \*\* SURFACE MOISTURE? AVERAGE, ARID REGION? N \*\* MONTH/SEASON ASSIGNMENTS? DEFAULT \*\* LATE AUTUMN AFTER FROST AND HARVEST, OR WINTER WITH NO SNOW: 12 1 2 \*\* WINTER WITH CONTINUOUS SNOW ON THE GROUND: 0\*\* TRANSITIONAL SPRING (PARTIAL GREEN COVERAGE, SHORT ANNUALS): 3 4 5 \*\* MIDSUMMER WITH LUSH VEGETATION: 6 7 8 \*\* AUTUMN WITH UNHARVESTED CROPLAND: 9 10 11 FREO SECT ANNUAL 1 SECTOR 1 0 360 SECT ALB

0.17 1.04

SITE\_CHAR

1

1

0.375

### AERSURFACE RESULT - DRY SURFACE MOISTURE

```
** Generated by AERSURFACE, dated 08009
** Center UTM Easting (meters): 280235.0
** Center UTM Northing (meters): 3289955.0
** UTM Zone: 15 Datum: NAD83
** Study radius (km) for surface roughness:
** Airport? N, Continuous snow cover? N
** Surface moisture? Dry, Arid region? N
** Month/Season assignments? Default
** Late autumn after frost and harvest, or winter with no snow: 12 1 2
** Winter with continuous snow on the ground: 0
** Transitional spring (partial green coverage, short annuals): 3 4 5
** Midsummer with lush vegetation: 6 7 8
** Autumn with unharvested cropland: 9 10 11
  FREQ SECT ANNUAL 1
               0 360
  SECTOR 1
                             Alb
                                      Bo
                                                Zo
                     Sect
                             0.17
                                      2.28
                                               0.375
                       1
  SITE CHAR
               1
```

### AERSURFACE RESULT - WET SURFACE MOISTURE

```
** Generated by AERSURFACE, dated 08009
** Center UTM Easting (meters):
** Center UTM Northing (meters): 3289955.0
** UTM Zone: 15
                  Datum: NAD83
** Study radius (km) for surface roughness:
** Airport? N, Continuous snow cover? N
** Surface moisture? Wet, Arid region? N
** Month/Season assignments? Default
** Late autumn after frost and harvest, or winter with no snow: 12 1 2
** Winter with continuous snow on the ground: 0
** Transitional spring (partial green coverage, short annuals): 3 4 5
** Midsummer with lush vegetation: 6 7 8
** Autumn with unharvested cropland: 9 10 11
  FREQ_SECT ANNUAL 1
                0 360
  SECTOR 1
                                      Во
                                                Zo
                     Sect
                             Alb
                                               0.375
  SITE CHAR
               1
                       1
                             0.17
                                      0.68
```

MODELING SOURCE PARAMETERS AND EMISSION RATES

Modeled Source	~	Emission Rate <sup>[1]</sup> PM <sub>10</sub> / PM <sub>2.5</sub> <sup>[2]</sup> Hr & 24-Hr			
ID	Description		(lb/hr)	(g/s)	(lb/hr)
EPN104	Unit No. 2 Sta	01	1.13	3.181E-01	2.52
CATSCNR2	Catalyst Screening for Reg	•		8.284E-04	6.57E-03

<sup>[1]</sup> Modeled Emissions for EPN 104

<sup>[2]</sup> Modeled Emissions for EPN 104

# DOWNWASH STRUCTURE HEIGHT

TABLE F-2. Downwash Structure Heights

Building No.	Description	Height (m)
WY 10	T1- 40	9.14
TK49	Tank 49 Tank 55	9.14 9.14
TK55		9.45
TK77	Tank 77	9.43 9.14
TK24	Tank 24	9.14 9.14
TK56	Tank 56 Tank 48	9.14 9.14
TK48	=	13.72
CONV1	Converter	19.81
CONV2	Converter	9.68
OLEUM	Oleum Tower	10.67
ABSTWR	Absorbing Tower	8.53
BRINKS	Brinks vessel	6.33 9.14
TK23	Tank 23	9.14
TK25	Tank 25	9.14 9.14
TK32	Tank 32	10.67
DRYTWR	Drying Tower	9.60
S2	Sulphur Tank S2	9.60 9.30
S1	Sulphur Tank S1	
DRYTWR2	Drying Tower	10.67
ABSTWR2	Absorbing Tower	10.67
OLEUM2	Oleum Tower	10.97
TK78	Spent Acid Tank 78	9.45
F1	F1 Tank	9.75
F2	F2 Tank	9.75
F3	F3 Tank	9.75
CT1	Cooling Tower 1	12.19 12.19
CT2	Cooling Tower 2	1
CT3	Cooling Tower 3	12.19 13.11
QUENCH	Quench Tower	19.51
DCGC	DCGC FGD1	14.33
ESP1	ESP1	14.33
ESP2	ESP2	9.14
TK53	Tank 53	
TK76	Tank 76	9.14 8.84
TK2	Tank 2	
TK10	Tank 10	9.45 9.14
TK31	Tank 31	9.14 9.14
TK12	Tank 12	9.14 9.14
TK11	Tank 11	7.32
TK18	Tank 18	
TK14	Tank 14	9.14
TK15	Tank 15	9.14
CIVIL	Structural and Civil Building	11.53
WAREHSE	Warehouse	6.43 15.88
ADF	ADF Storage	
SHOP1	Office and Area 1 Shop	6.25
AWT	AWT Building	8.61 9.15
UNLOAD	Truck Unloading	8.15
SAFEROOM	Safety Equip. Room	6.10
WHB	Waste Heat Boiler	11.58
STMDRUM	WH Boiler Steam Drum	15.24

Rhodia, Inc.
Houston Plant
Permit 4802 Amendment

Trinity Consultants 114402.0054 June 2011

TABLE F-2. Downwash Structure Heights

Building No.	Description	Height
		(m)
LAB	Consolidated Lab	7.75
MAINT	Maintenance Office	7.06
OFFICE	Office	7.09
TEX	Tex Ultra Pure	18.49
UNOFF	Old Lab	6.05
UNBLD1	65% building	8.53
UNBLD2	65% storage	7.70
NEHOUSE	North-East Wahrehouse	6.71
SAFETY	Safety Building	4.27
CT7	No. 7 Cooling Tower	10.26
GEAR	Switch Gear and Compressor	9.14
TURBO	Turbo Generator	9.14
CTRL	Control Room	5.94
CTGE	G. E. Cooling Tower	13.46
FURNACE	Furnace	7.98
BLD24	No. 8 Cooling Tower	14.94
BLD27	Building under AT and DT	6.25
BLD29	Building under OT	3.05
BLD30	Fin Fan A	4.57
BLD31	Fin Fan B	4.57
BLD32	Fin Fan C	4.57
BLD89	<b>Building Under Oleum Tower</b>	4.88
BLD91	Denim Building	12.19
BLD92	Turbo Gen	14.94
BLD1	Pop-dock building	24.38
TK1 N	<u>.</u>	10.28
TK2 N		10.28
TK3 N		10.28
BLD1_N		4.73
BLD2 N		3.20

### **ELECTRONIC FILES**

**EXCERPTS FROM CONSENT DEGREE** 

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF INDIANA HAMMOND DIVISION

2007 APR 26 API 11: 20
STEPPING TO THE MODERNE COURTY
FOR THE MODERNE COURTY
OF HOULEST

UNITED STATES OF AMERICA,

Plaintiff,

٧.

Civil Action No.

2:07CV134WL

RHODIA INC.,

Defendant.

#### COMPLAINT

The United States of America, by authority of the Attorney General of the United States and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency (EPA), alleges:

#### NATURE OF THE ACTION

1. This is a civil action brought against Rhodia Inc. (Rhodia or Defendant) pursuant to Section 113(b) of the Clean Air Act (the Act), 42 U.S.C. § 7413, for injunctive relief and civil penalties for violations at Rhodia's eight sulfuric acid plants nationwide of Part C of Title I of the Act, 42 U.S.C. §§ 7470-7492, the Prevention of Significant Deterioration (PSD) provisions of the Act; Part D of Title I of the Act 42 U.S.C. §§ 7501-7515, the non-attainment New Source Review (nonattainment NSR) provisions of the Act; certain New Source Performance Standards (NSPS) promulgated under Section 111 of the Act, 42 U.S.C. § 7411; the Title V Permit requirements of the Act, 42 U.S.C. § 7661; and the federally enforceable State Implementation Plans (SIPs) for Indiana, Louisiana, Texas and California approved by EPA pursuant to Section 110 of the Act, 42 U.S.C. § 7410, which incorporate and/or implement the above-listed federal

penalties owed by Rhodia to the State of Indiana shall be paid twenty percent (20%) to the State of Indiana and eighty percent (80%) to the City of Hammond; and

d. \$333,333.50 to the Bay Area Air Quality
Management District. Payment of the civil penalties and of any
stipulated penalties owed to the Bay Area Air Quality Management
District shall be made by check made payable to the Bay Area Air
Quality Management District and sent to Bay Area Air Quality
Management District, Office of District Counsel, Brian C.
Bunger, Esq., District Counsel, 939 Ellis Street, San Francisco,
California 94109.

## V. COMPLIANCE REQUIREMENTS

### 11. Emission Limits

- a. <u>Hammond</u>: By the Effective Date specified in Paragraph 11.i., below, the Hammond sulfuric acid plant shall meet the following  $SO_2$  emission limits:
- i. A Long-Term Limit of 2.50 lbs/ton.

  Defendant shall commence monitoring as of the Effective Date.

  Defendant shall have until 365 days after the Effective Date to demonstrate compliance with this Long-Term Limit;
  - ii. A Short-Term Limit of 3.50 lbs/ton;
  - b. Martinez: By the Effective Date specified in

Paragraph 11.i., below, the Martinez sulfuric acid plant shall meet the following SO<sub>2</sub> emission limits:

- i. A Long-Term Limit of 2.20 lbs/ton.

  Defendant shall commence monitoring as of the Effective Date.

  Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;
  - ii. A Short-Term Limit of 3.00 lbs/ton.
- c. <u>Dominguez</u>: By the Effective Date specified in Paragraph 11.i., below, the Dominguez sulfuric acid plant shall meet the following SO<sub>2</sub> emission limits:
- i. Comply with the applicable annual SO<sub>2</sub> allocation as determined by the South Coast Air Quality Management District's Regional Clean Air Incentives Market (RECLAIM), as defined in Regulation XX of the South Coast Air Quality Management District Rules;
  - ii. A Short-Term Limit of 3.50 lbs/ton.
- d. Houston #8: By the Effective Date specified in Paragraph 11.i., below, the Houston #8 sulfuric acid plant shall meet the following SO<sub>2</sub> emission limits:
- i. A Long-Term Limit of 1.70 lbs/ton.

  Defendant shall commence monitoring as of the Effective Date.

  Defendant shall have until 365 days from the Effective Date to

demonstrate compliance with this Long-Term Limit;

- ii. A Short-Term Limit of 3.00 lbs/ton.
- e. <u>Baytown Facility</u>: By the Effective Date specified in Paragraph 11.i., the Baytown sulfuric acid plant shall meet the following SO<sub>2</sub> emission limits:
- i. A Long-Term Limit of 2.20 lbs/ton.

  Defendant shall commence monitoring as of the Effective Date.

  Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;
  - ii. A Short-Term Limit of 3.00 lbs/ton.
- f. <u>Baton Rouge #2</u>: By the Effective Date specified in Paragraph 11.i., the Baton Rouge #2 sulfuric acid plant shall meet the following SO<sub>2</sub> emission limits:
- i. A Long-Term Limit of 2.20 lbs/ton.

  Defendant shall commence monitoring as of the Effective Date.

  Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;
  - ii. A Short-Term Limit of 3.00 lbs/ton.
- g. <u>Baton Rouge #1</u>: Beginning on the Effective Date specified in Paragraph 11.i., the Baton Rouge #1 sulfuric acid plant shall meet the following SO<sub>2</sub> emission limits:
  - i. A Long-Term Limit of 1.90 lbs/ton.

Defendant shall commence monitoring as of the Effective Date.

Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;

- ii. A Short-Term Limit of 3.00 lbs/ton.
- h. <u>Houston #2</u>: Beginning on the Effective Date specified in Paragraph 11.i., the Houston #2 sulfuric acid plant shall meet the following SO<sub>2</sub> emission limits:
- i. A Long-Term Limit of 1.80 lbs/ton.

  Defendant shall commence monitoring as of the Effective Date.

  Defendant shall have until 365 days from the Effective Date to demonstrate compliance with this Long-Term Limit;
  - ii. A Short-Term Limit of 3.00 lbs/ton.
- i. Effective Dates for Emission Limits: The

  Effective Dates for each emission limit specified in Paragraph

  11.a. through 11.h., are as follows:
  - i. Hammond: July 1, 2007
  - ii. Martinez: July 1, 2007
  - iii. Dominguez: July 1, 2007
  - iv. Baytown: January 1, 2009
  - v. Houston #8: July 1, 2009
  - vi. Baton Rouge #2: January 1, 2011
  - vii. Baton Rouge #1: May 1, 2012

viii. Houston #2: April 1, 2014.

- Date for achieving the applicable SO<sub>2</sub> emission limits specified in Paragraphs 11.a. through 11.i., each sulfuric acid plant shall be considered an affected facility for purposes of the New Source Performance Standard (NSPS) 40 C.F.R. Part 60, Subpart H. Not later than the applicable Effective Date, each sulfuric acid plant covered by this Consent Decree shall comply with all applicable requirements for affected facilities under the NSPS 40 C.F.R. Part 60, Subparts A and H, or the Consent Decree if more stringent. Notices and other obligations set forth in this Consent Decree shall be deemed to satisfy all applicable initial notification and compliance demonstration requirements of NSPS Subparts A and H.
- k. Acid Mist Limits: Not later than the effective date of this Consent Decree, each of the sulfuric acid plants shall comply with the NSPS, Subpart H sulfuric acid mist emission limitation of 0.15 lbs/ton of 100% sulfuric acid produced, as set forth at 40 C.F.R. § 60.83(a)(1). Compliance with this limit is to be demonstrated using the performance test required by paragraph 14 of this Consent Decree.
  - Best Practices: Consistent with 40 C.F.R.

§ 60.11(d), at all times, including periods of Startup,
Shutdown, and Malfunction, Defendant shall, to the extent
practicable, maintain and operate each of its sulfuric acid
plants, including associated air pollution control equipment, in
a manner consistent with good air pollution control practice for
minimizing emissions.

- m. <u>Scrubber Design</u>: All new scrubbers installed pursuant to this Consent Decree and used for SO<sub>2</sub> control at any of the sulfuric acid plants shall be designed to achieve at least 95% removal efficiency, except during periods of Startup, Shutdown and Malfunction.
- 12. Interim Emission Limits: Upon the effective date of this Consent Decree and until the Effective Date of the SO<sub>2</sub> emission limits specified in Paragraph 11.d., 11.f., 11.g., 11.h., for the Houston # 8, Baton Rouge #2, Baton Rouge #1, and Houston #2 sulfuric acid plants, Defendant shall comply with an interim SO<sub>2</sub> emission limit at each of these sulfuric acid plants. The interim SO<sub>2</sub> emission limit for each of these sulfuric acid plants shall be the permit limit in place at the time of the effective date of this Consent Decree or the currently applicable State Implementation Plan emission limit for SO<sub>2</sub>, whichever is more stringent.

# 13. Continuous Emissions Monitoring System:

- than the Effective Date of each SO<sub>2</sub> emission limit established under Paragraph 11.a. through 11.i., Defendant shall install and make operational a SO<sub>2</sub> continuous emissions monitoring system (CEMS). Except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments, the CEMS shall be operated during all sulfuric acid plant Operating Hours, and shall be used at each sulfuric acid plant to demonstrate compliance with the SO<sub>2</sub> emission limits established in Paragraph 11 of this Consent Decree. The SO<sub>2</sub> CEMS shall meet the following requirements:
- i. The SO<sub>2</sub> CEMS shall monitor and record the 3-hour arithmetic average (not weighted by production volume) SO<sub>2</sub> emission rate from each sulfuric acid plant in units of lbs per ton of 100% acid produced;
- ii. Except for the Dominguez facility, the SO<sub>2</sub> CEMS shall monitor and record the SO<sub>2</sub> emission rate from each sulfuric acid plant averaged (arithmetic average, not weighted by production volume) over all Operating Hours in each rolling 365-day period in units of 1bs per ton of 100% acid produced; and

iii. The CEMS shall be installed, certified, calibrated, maintained, and operated in accordance with the applicable requirements of 40 C.F.R. §§ 60.11, 60.13, Part 60, Appendix B Performance Specification 2, and Part 60 Appendix F Procedure 1, except as otherwise provided in this Consent Decree or as provided in the approved Alternative Monitoring Plans described in Paragraph 13.b below. If an O2 monitor is necessary, it shall meet 40 C.F.R. Part 60, Appendix B Performance Specification 3.

plan for each of its Facilities that describes how Defendant proposes to implement the monitoring requirements of this Paragraph, including the methodology Defendant proposes to use to demonstrate compliance in the event of CEMS downtime lasting longer than 24 hours. Monitoring methods specified in this Consent Decree have been approved as appropriate alternative monitoring methods for purposes of NSPS, per 40 C.F.R. § 60.13(i). The Alternative Monitoring Plans are included as Appendix A. These plans supersede the corresponding SO<sub>2</sub> monitoring requirements of the NSPS and the applicable SO<sub>2</sub> monitoring requirements of the State Parties. Defendant shall implement the Alternative Monitoring Plans in the States of the

State Parties upon installation of the SO<sub>2</sub> CEMS at each of the sulfuric acid plants. In the States that are not State Parties (as well as in the South Coast Air Quality Management District), Defendant shall either reach agreement with those States to follow the Alternative Monitoring Plans in lieu of those States' SO<sub>2</sub> monitoring requirements, or else conduct SO<sub>2</sub> monitoring in compliance with those States' laws and regulations, in lieu of compliance with the Alternative Monitoring Plans.

- c. Defendant shall take all steps necessary to avoid CEMS breakdowns and minimize CEMS downtime. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
- d. In the event of CEMS downtime lasting longer than 24 hours, Defendant shall demonstrate compliance with the applicable emission limits in Paragraph 11 according to the procedures specified in the Alternative Monitoring Plans referenced in Paragraph 13.b. above.

# 14. Performance Testing

a. By no later than 120 days after the effective date of this Consent Decree, Defendant shall conduct an initial

ALTERNATE MONITORING PLAN

# Alternative Monitoring Plan for SO₂ Emissions Rhodia Inc. Houston, TX Unit 2 Single Absorption Sulfuric Acid Regeneration Plant with Scrubber

# Justification for Using an Alternative Monitoring Plan (AMP) for SO<sub>2</sub> emissions

The regulations that established the NSPS for sulfuric acid plants are over 30 years old. At the time, the regulatory standard was established as 4 lb of  $SO_2$  emissions per ton of 100 % sulfuric acid produced, and compliance with the standard was to be demonstrated using a calculation similar to Equation 1 below. Regulations required the use of a CEMS to measure  $SO_2$  concentration at the stack (M2), but only required measurement of  $SO_2$  entering the converter by suitable method three times per calendar day. Plants typically rely on the use of a Reich test once per shift to establish the  $SO_2$  concentration entering the converter (M1). While the stack measurement represented a nearly continuous real time indication of the stack concentration, performing a Reich test once per shift for the converter inlet concentration provides little more than a random sample once every eight hours.

The methodology proposed in this AMP will provide a more continuous real-time indication of compliance by using a process analyzer to measure the converter inlet SO<sub>2</sub> concentration. While this analyzer will be nearly identical to the CEMS that is commonly used at the stack, it will not be able to meet all of the standards that are usually applied to a CEMS because of the process conditions and / or physical limitations of an existing facility. For example, it is not feasible to modify the existing ductwork around the analyzer to meet the normal guidelines for straight runs of pipe upstream / downstream of the analyzer. We believe that the disadvantages (places where the analyzer is not quite up to CEMS standards) are far outweighed by the advantages of using a real time instrument, rather than a periodic Reich test, to measure the converter inlet concentration. Rhodia will use best professional judgment to ensure the analyzer located at the converter inlet provides representative data.

Except as noted in this document, the objective of this proposed AMP is to maintain the process analyzer at the converter inlet in a manner that is similar to the stack CEMS, as set forth in 40 CFR Part 60, Appendix B and F.

### **Definitions**

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned.

"Long-Term Limit" shall mean a sulfur dioxide (SO<sub>2</sub>) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor

maintenance or careless operation.

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

"Short-Term Limit" shall mean the SO<sub>2</sub> emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times.

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases.

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

#### Pt. 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO<sub>2</sub> analyzers at the converter inlet and exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.

#### Equation 1

 $Xe = (M1 - M2)/(M1 - 1.5 \times M1 \times M2)$  E = (K / Xe) - KWhere:

Xe = fractional conversion efficiency

M1 = fractional concentration of SO<sub>2</sub> entering the converter

M2 = fractional concentration of SO<sub>2</sub> at the stack

E = SO<sub>2</sub> emission rate in lb / ton of 100 % acid produced

 $K = 1306 = (2000 \text{ lb / ton}) \times (64 \text{ lb / lbmol SO2})/(98 \text{ lb / lbmol H}_2SO_4)$ 

### **Short-Term Limit**

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for  $SO_2$ .

At any given time the system will maintain an array consisting of the 36 most recent samples
of the SO<sub>2</sub> concentrations at the converter inlet and at the exit stack.

Once every five minutes, the system will sample the latest SO<sub>2</sub> concentrations, add the
recent readings to the array and delete the oldest readings. If the unit is not operating then
the array of data will not change.

M1<sub>3hravg</sub> will then be calculated as the arithmetic average of the 36 most recent data samples

for the fractional concentration of SO<sub>2</sub> entering the converter (M1<sub>3hravg</sub>).

M2<sub>3hravg</sub> will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO<sub>2</sub> at the stack (M2<sub>3hravg</sub>).

The rolling 3 hour average SO<sub>2</sub> emissions (E<sub>3hravg</sub>) will then be calculated per Equation 2.

Equation 2 (rolling 3 hour average SO<sub>2</sub> emissions)
$$Xe_{3hravg} = (M1_{3hravg} - M2_{3hravg})/(M1_{3hravg} - 1.5 \times M1_{3hravg} \times M2_{3hravg})$$

$$E_{3hravg} = (K / Xe_{3hravg}) - K$$

The production unit will be deemed to be operating in compliance with the Short Term Limit if
 E<sub>3hr-avg</sub> does not exceed 3.0 lb of SO<sub>2</sub> per ton of 100% sulfuric acid produced during all
 Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the  $SO_2$  monitors, the  $SO_2$  measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

### Long-Term Limit

The following method will be used to calculate the daily average lb of SO₂ per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the SO<sub>2</sub> concentrations (converter inlet
  and exit stack) will be sampled and this time will be counted as five operating minutes. If the
  unit is not operating, then the SO<sub>2</sub> concentrations will not be sampled.
- The daily average will be calculated as follows for each calendar day:

 M1<sub>dally avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of SO<sub>2</sub> entering the converter.

 M2<sub>daily avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of SO<sub>2</sub> at the stack

E<sub>(daily avg)</sub> will then be calculated using Equation 3.

The number of operating minutes for the day will be summed (T<sub>day</sub>, )

 E<sub>dayavg</sub> and T<sub>day</sub> will be used to calculate a 365-day rolling average of lb/ton. The daily averages will be weighted by the number of operating minutes per day, as per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO<sub>2</sub> emission rate will be calculated using Equation 4.

#### Equation 4

$$E_{365avg} = \frac{\sum [E_{dayavg} * T_{day}]}{\sum T_{day}}$$

The production unit will be deemed to be operating in compliance with the Long-Term Limit if  $E_{365avg}$  does not exceed 1.8 lb of  $SO_2$  per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the SO<sub>2</sub> monitors, the SO<sub>2</sub> measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunction, breakdowns, and repairs:

# Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack and Converter Inlet Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup. Specifications for the analyzer located at the converter inlet are based on Rhodia's experience with process analyzers at these locations.

An equivalent analyzer may be substituted for any reason.

Location	Manufacturer	Model Number	Range
Stack	Ametek Photometric Analyzer (or equivalent)	920 (or equivalent)	Dual range:  Normal: 0 - 500 ppm SO <sub>2</sub> SSM: 0 - 3,600 ppm SO <sub>2</sub>
Converter Inlet	Ametek Photometric Analyzer (or equivalent)	920 or IPS-4 (or equivalent)	Single range: 0 - 15 % SO₂

# Pt. 60, App. B, Spec. 2, Section 1.0 (Stack and Converter Inlet Analyzers)

Initial compliance certification required only if the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

# Pt. 60, App. B, Spec. 2, Section 8.0 (Converter Inlet Analyzer)

Rhodia will select the optimum location to obtain representative SO<sub>2</sub> readings from this location. Turbulence near the blower exit and elevated temperature at the converter inlet may require an analyzer measurement location that differs from the requirements of this section (e.g. pollutant stratification). A pollutant stratification test is not warranted for this application because (a) process conditions make it extremely unlikely that stratification could occur, and (b) the samples obtained under this monitoring plan are the same as would be obtained under the NSPS, except that the

H-5

instrument will typically take 288 samples per day rather than the 3 required by the NSPS. Therefore, no new stratification risk is introduced by this method, but the instrument will typically take about 100 times as many samples.

# Pt. 60, App. B, Spec. 2, Section 16.0 (Converter Inlet Analyzer)

Rhodia will use the Alternative Relative Accuracy Procedure provided in Section 16.2.1 (i.e. conduct a cylinder gas audit).

# Pt. 60, App. F, Spec. 2, Section 5.0 (Converter Inlet Analyzer)

Rhodia will use quarterly cylinder gas audits (i.e. four per year) to satisfy the requirements of this section.

# **System Maintenance and Malfunction**

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above

In the event of a CEMS malfunction of greater than 24 hours:

 Exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours.. Sampling will be conducted by Reich test or other method (e.g. portable analyzer).

- Converter inlet gas will either be sampled, or estimated using engineering judgment, at least

once every four hours during all Operating Hours.

Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exceptions. If the stack CEMS is out of service, the most recent hourly reading will be substituted for the 12 five-minute readings that would otherwise be taken if the system was operating normally. Similarly, if the converter inlet SO<sub>2</sub> analyzer is out of service, the most recent four-hour reading will be substituted for the 48 five-minute readings that would otherwise be taken if the system was operating normally.

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

### **System Modifications**

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- · Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

### **Alternative Monitoring System**

The monitoring system proposed in this Alternative Monitoring Plan is expected to be a significant improvement over the monitoring requirements contained in the NSPS for sulfuric acid plants. However, the real-time calculation of  $SO_2$  emissions is dependent upon the use of an  $SO_2$  analyzer in the inlet duct to the converter, and the maintenance of that analyzer to approximately the same performance standards normally applied to the stack  $SO_2$  CEMS. This is an unproven application of this technology, and there is some risk that the converter inlet  $SO_2$  analyzer will not be able to perform as required despite the best efforts of Rhodia and the instrument manufacturer.

If Rhodia and the instrument manufacturer are unable to make the system operate to the indicated standards because the converter inlet SO<sub>2</sub> analyzer is unreliable and / or inaccurate in this application, then Rhodia will promptly notify EPA Region 6, and TCEQ of its determination and proceed as follows:

- Rhodia will immediately begin meeting its SO<sub>2</sub> emissions monitoring requirements in accordance with 40 CFR Part 60, Subpart H, except that the SO<sub>2</sub> concentration at the converter inlet will be analyzed six times per day rather than the three times per day specified in the regulations.
- Rhodia will provide whatever information is requested by EPA regarding the determination that the converter inlet SO<sub>2</sub> analyzer can not meet the necessary performance standards.
- Rhodia will work with EPA to determine whether real time measurement of SO<sub>2</sub> emissions (in lbs / ton of acid) can be readily accomplished through other means without the use of an SO<sub>2</sub> analyzer at the converter inlet.

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# **Program Management Files:**

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9<sup>th</sup> Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

**EXR** - External Relations

GEO - Geographical Summary Data

**GRA** - Grants Administration

The majority of this section requires the Fiscal Year accompany file code. Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

**OPP - Operating Permits Program** 

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

**REG** - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

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TSU - Technical Support

VRP - Voluntary Reduction Program





# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 22, 2011

MR FLOYD DICKERSON ENVIRONMENTAL MANAGER RHODIA INC 8615 MANCHESTER ST HOUSTON TX 77012-2142

Re: Permit Amendment Application

Permit Number: 19282 No. 8 Sulfuric Acid Unit Houston, Harris County

Regulated Entity Number: RN100220581 Customer Reference Number: CN600125330

Account Number: HG-0697-O

Associated Permit Number: PSDTX1081

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AIR PERMITS SECTION

Dear Mr. Dickerson:

This is in response to your letter received August 1, 2011 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 19282. We understand you propose to include planned maintenance, startup and shutdown activities and emissions and authorize existing particulate matter emissions into the permit for the first time.

As indicated in Title 30 Texas Administrative Code § 116.116(b) [30 TAC § 116.116(b)], and based on our review, Permit Number 19282 is hereby amended. This information will be incorporated into the existing permit file. Enclosed are revised special conditions pages and a maximum allowable emission rates (MAERT) table to replace those currently attached to your permit. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met.

Planned maintenance, startup, and shutdown for the sources identified on the MAERT have been reviewed and included in the MAERT and specific maintenance activities are identified in the permit special conditions. Any other maintenance activities are not authorized by this permit and will need to obtain separate authorization.

Mr. Floyd Dickerson Page 2 November 22, 2011

Re: Permit Number: 19282

This amendment will be automatically void upon the occurrence of any of the following, as indicated in 30 TAC § 116.120(a):

1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.

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- 2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.
- 3. Failure to complete the changes authorized by this amendment within a reasonable time.

Upon request, the executive director may grant extensions as allowed in 30 TAC § 116.120(b).

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

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www.tceq.texas.gov/compliance/compliance\_support/qa/env\_lab\_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.texas.gov.

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

Mr. Floyd Dickerson Page 3 November 22, 2011

Re: Permit Number: 19282

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the <u>effective date of the approval</u>. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Stephen Anderson, P.E. at (512) 239-1287 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Michael Wilson, P.E., Director

Air Permits Division

Office of Air

Texas Commission on Environmental Quality

MPW/SEA

**Enclosures** 

cc: Air Section Manager, Region 12 - Houston

Director, Environmental Public Health Division, Harris County Public Health and Environmental Services, Pasadena

Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston Department of Health and Human Services, Houston

Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 168535

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#### SPECIAL CONDITIONS

#### Permit Numbers 19282 and PSDTX1081

### **Emission Standards**

- 1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
- Sulfur dioxide (SO<sub>2</sub>) emissions limits will be limited to the following emission rates: Short term - 3.0 pounds of SO<sub>2</sub> per ton of one hundred percent acid produced.
   Long term - 1.7 pounds of SO<sub>2</sub> per ton of one hundred percent acid produced.

There values correlate to hourly and yearly SO<sub>2</sub> emission rates found in the maximum allowable emissions rates table (MAERT) from Emission Point Number (EPN) 101. (PSD) (01/08)

These facilities shall comply with all applicable requirements shall comply with all applicable requirements of EPA regulations on Standards of Performance for New Stationary Sources promulgated for the following: (11/11)

- A. Emission Guidelines and Compliance Times for Sulfuric Acid Production Units in 40 CFR Part 60, Subparts A and Cd, and
- B. Sulfuric Acid Plants in 40 CFR Part 60, Subparts A and H.

The sulfur acid mist (H<sub>2</sub>SO<sub>4</sub>) mist limits are limited to 0.15 pound per ton of H<sub>2</sub>SO<sub>4</sub> EPN 101. SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> mist emission limits effective on and after July 1, 2009 shall never be relaxed. (PSD) (12/07)

Natural gas use for furnace heat ups are limited to 150 hours per rolling 12 months at a maximum hourly fired duty of 50 MMBtu and shall be emitted through EPNs 103, 105 and 106. Records shall be kept at the plant site and updated once every six months to demonstrate compliance with this representation. Records shall be made readily available to Texas Commission on Environmental Quality (TCEQ) personnel upon request, the U.S. Environmental Protection Agency (EPA) personnel or any applicable local program with jurisdiction. (11/11)

3. H<sub>2</sub>SO<sub>4</sub> production is limited to 2,600 tons per day. The holder of this permit shall keep records of the daily production of H<sub>2</sub>SO<sub>4</sub>. Records shall be made readily available to TCEQ personnel upon request, EPA personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO<sub>2</sub> emissions limitations specified in the MAERT. (PSD) (04/10)

- 4. <u>Piping, Valves, Flanges, Connectors, Pumps and Compressors in Gaseous and Liquid Sulfur Dioxide (SO<sub>2</sub>) Service (12/07)</u>
  - A. Audio, olfactory and visual checks for gas and liquid SO<sub>2</sub> leaks within the operating area shall be made once every shift. This special condition will apply upon start-up of the represented increase in H<sub>2</sub>SO<sub>4</sub> production from the October 2006 amendment submittal.
  - B. Process gas leaks shall be addressed upon detection of a gaseous SO<sub>2</sub> leak by plant personnel who shall take the following actions:
    - (1) Locate and determine the extent of the process gas leak.
    - (2) Commence to make repairs to the gas leak.
      - (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.
  - C. Liquid leaks found in damaged or leaking valves, connectors and pump seals in the SO<sub>2</sub> scrubber authorized in the October 2006 amendment submittal found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair or replace a leaking component as specified in this paragraph within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.
  - D. Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made readily available to representatives of the TCEQ or any local program with jurisdiction upon request.

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# Initial Determination of Compliance

5. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Unit No. 8 Stack designated as EPN 101. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. (PSD) (07/07)

- A. Sampling shall be conducted in accordance with Title 40 Code of Federal Regulations (40 CFR) Part 60, Appendix A, Method 7, "Determination of Nitrogen Oxide (NO<sub>x</sub>) Emissions from Stationary Sources" and Method 8, "Determination of SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> Emissions from Stationary Sources" and Method 10, "Determination of Carbon Monoxide (CO) Emissions from Stationary Sources" and other applicable testing methods.
- B. The appropriate TCEQ Regional Office in the region where the source is located and applicable local air program(s) shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit provision or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standard testing which must have EPA approval shall be submitted to the TCEQ Field Operations Division in Austin.

C. Air contaminants emitted from the Unit No. 8 Stack to be tested for include chlorine, SO<sub>2</sub>, H<sub>2</sub>SO<sub>4</sub> mist, CO, NO<sub>x</sub>, antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, silver and thallium. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1 and 2.

- D. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires prior approval and requests shall be submitted to the TCEQ Field Operations Division in Austin.
- E. The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permittee) for the H<sub>2</sub>SO<sub>4</sub> unit at the time of testing. The H<sub>2</sub>SO<sub>4</sub> production rate shall be monitored and recorded during the stack test. If the normal production rate of H<sub>2</sub>SO<sub>4</sub> from this facility exceeds by more than 10 percent the tons per day maintained during sampling, the company must notify, in writing, the appropriate TCEQ Regional Office, and the source may be subject to additional sampling to demonstrate continued compliance.
- F. Sampling reports shall comply with the attached conditions of Chapter 14 of the TCEQ Sampling Procedures Manual. The final sampling report shall be forwarded to the following within sixty days after sampling is completed:

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One copy to the TCEQ Houston Regional Office.

One copy to each appropriate local air pollution control program.

One copy to the EPA Region 6 New Source Review Section in Dallas.

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# Continuous Determination of Compliance

- 6. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO<sub>2</sub> and the total gas flow rate from the Unit No. 8 Stack (EPN 101).
  - A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ±5 percent from the tagged cylinder gas value.
  - B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO<sub>2</sub> per hour at least once every month.

- C. All monitoring data and quality-assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ personnel, EPA personnel or any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO<sub>2</sub> emission limits specified in MAERT.
- D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace, but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments. (12/07)
- E. CEMS shall be used to demonstrate compliance with the SO<sub>2</sub> emission limits as found in Special Condition No. 2. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the Alternate Monitoring Plan (AMP) (Attachment A). (12/07)
  - (1) The SO<sub>2</sub>CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO<sub>2</sub> emission rate in units of pounds per ton of one hundred percent acid produced.
  - (2) The SO<sub>2</sub> CEMS shall monitor and record the SO<sub>2</sub> emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
  - (3) Implementation of the monitoring requirements has been defined in the AMP for the SO<sub>2</sub> CEMS system.
  - (4) The AMP supersedes the corresponding SO<sub>2</sub> monitoring requirements of NSPS Subpart H.
  - (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
  - (6) In the event of a CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 2 according to the procedures specified in the AMP.

7. The minimum liquid flow to the second stage of the absorber shall be 600 gallons per minute (gpm). The circulation rate shall be monitored and recorded at least once a day. (11/11)

The liquid flow rate shall be recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

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The minimum pH of the scrubbing solution downstream of the Brinks mist filter is 5.0. This pH shall be analyzed and recorded at least once a day.

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Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within 0.5 pH unit.

Quality-assured (or valid) data must be generated when the facility generating emissions are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the facility generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

- 8. The following requirements apply to capture systems for EPN 101. (07/07)
  - A. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system;
  - B. The control device shall not have a bypass.
  - C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.

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### Planned Maintenance, Startup and Shutdown

9. Catalyst converter planned MSS activity is limited to 512 hours per rolling twelve months from EPN CATSCNU8. Planned MSS generated particulate emissions shall be directed to a bag filter. Outlet bag filter grain loading shall be limited to a maximum of 0.01 grains per dry standard cubic foot. (11/11)

Only these planned MSS activities described in this condition are authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the maintenance, start-up, and shutdown (MAERT). The performance of each planned maintenance activity and emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis. These records shall include at least the following information: (11/11)

- (1) The physical location at which emissions from the planned MSS activity occurred, including the emission point number, common name, and any other identifier for the point at which the emissions were released into the atmosphere;
- (2) The type of planned MSS activity and the reason for the planned activity;
- (3) The common name and the facility identification number of the facilities at which the planned MSS activity and emissions occurred;
- (4) The date and time of the planned MSS activity and its duration;
- (5) The estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the amendment application, PI-1 dated July 28, 2011, consistent with good engineering practice.

### ATTACHMENT A

# Alternative Monitoring Plan for SO<sub>2</sub> Emissions Rhodia Inc. Houston, Texas Unit 8 Single Absorption Sulfuric Acid Plant with Scrubber

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# Justification for Using an Alternative Monitoring Plan (AMP) for SO<sub>2</sub> emissions

Sulfur dioxide emissions from the Houston 8 sulfuric acid unit will be monitored in accordance with the requirements of the existing NSPS for sulfuric acid plants except as noted in this AMP. The CEMS will demonstrate compliance on a real-time basis with the SO<sub>2</sub> emissions standard (as lbs of SO<sub>2</sub> per ton of 100% sulfuric acid produced) using stack SO<sub>2</sub> and O<sub>2</sub> analyzers. The purpose of this AMP is to document the calculation methods that will be utilized to demonstrate compliance with regulations as modified by the Consent Decree.

#### **Definitions**

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned.

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"Long-Term Limit" shall mean a sulfur dioxide (SO<sub>2</sub>) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor maintenance or careless operation.

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

"Short-Term Limit" shall mean the SO<sub>2</sub> emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times.

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases.

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

# Part 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO<sub>2</sub> and O<sub>2</sub> analyzers at the exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.

# Equation 1

```
    Xe = (0.209 - MO2 - MSO2) / (0.209 - MO2 + 0.186 x MSO2)
    E = (K / Xe) - K
    Where:
    Xe = fractional conversion efficiency
    MO2 = fractional concentration of O<sub>2</sub> at the stack, dry basis
    MSO2 = fractional concentration of SO<sub>2</sub> at the stack, dry basis
    E = SO<sub>2</sub> emission rate in lb / ton of 100 % acid produced
    K = 1306 = (2000 lb / ton) x (64 lb / lbmol SO2)/(98 lb / lbmol H<sub>2</sub>SO<sub>4</sub>)
```

### **Short-Term Limit**

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for SO<sub>2</sub>.

- At any given time the system will maintain an array consisting of the 36 most recent samples of the  $O_2$  and  $SO_2$  concentrations at the exit stack.
- Once every five minutes, the system will sample the latest O<sub>2</sub> and SO<sub>2</sub> concentrations, add the recent readings to the array and delete the oldest readings. If the unit is not operating then the array of data will not change.
- MO2<sub>3hravg</sub> will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of O<sub>2</sub> at the stack (MO2<sub>3hravg</sub>).

- MSO2<sub>3hravg</sub> will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO<sub>2</sub> at the stack (MSO2<sub>3hravg</sub>).
- The rolling 3 hour average SO<sub>2</sub> emissions (E<sub>3hravg</sub>) will then be calculated per Equation 2.

Equation 2 (rolling 3 hour average SO<sub>2</sub> emissions)
$$Xe_{3hravg} = (0.209 - MO2_{3hravg} - MSO2_{3hravg}) / (0.209 - MO2_{3hravg} + 0.186 \text{ x}$$

$$MSO2_{3hravg}$$

$$E_{3hravg} = (K / Xe_{3hravg}) - K$$

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- The production unit will be deemed to be operating in compliance with the Short Term Limit if E<sub>3hr-avg</sub> does not exceed 3.0 lb of SO<sub>2</sub> per ton of 100% sulfuric acid produced during all Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the O<sub>2</sub> or SO<sub>2</sub> monitors, the O<sub>2</sub> or SO<sub>2</sub> measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

# Long-Term Limit

The following method will be used to calculate the daily average lb of SO<sub>2</sub> per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the O<sub>2</sub> and SO<sub>2</sub> concentrations at the exit stack will be sampled and this time will be counted as five operating minutes. If the unit is not operating, then the O<sub>2</sub> and SO<sub>2</sub> concentrations will not be sampled.

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- The daily average will be calculated as follows for each calendar day:
  - o MO2<sub>daily avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of O<sub>2</sub> at the stack.
  - o MSO2<sub>daily avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of SO<sub>2</sub> at the stack
    - o E<sub>(daily avg)</sub> will then be calculated using Equation 3.

Equation 3 (daily average SO<sub>2</sub> emissions)
$$Xe_{daily avg} = (0.209 - MO2_{daily avg} - MSO2_{daily avg}) / (0.209 - MO2_{daily avg} \pm 0.186 \text{ x}$$

$$MSO2_{daily avg})$$

$$E_{\text{daily avg}} = (K / Xe_{\text{daily avg}}) - K$$

- o The number of operating minutes for the day will be summed ( $T_{day}$ ,)
- E<sub>dayavg</sub> and T<sub>day</sub> will be used to calculate a 365-day rolling average of lb/ton. The
  daily averages will be weighted by the number of operating minutes per day, as
  per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO<sub>2</sub> emission rate will be calculated using Equation 4.

# Equation 4

$$E_{365avg} = \underbrace{\sum [E_{dayavg} * T_{day}]}_{\sum T_{day}}$$

The production unit will be deemed to be operating in compliance with the Long-Term Limit if E<sub>365avg</sub> does not exceed 1.7 lb of SO<sub>2</sub> per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the O<sub>2</sub> or SO<sub>2</sub> monitors, the O<sub>2</sub> or SO<sub>2</sub> measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunction, breakdowns, and repairs:

# Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup.

An equivalent analyzer may be substituted for any reason.

Location	Manufacturer	Model Number	Range
Stack SO <sub>2</sub>	Ametek Photometric Analyzer (or equivalent)	920 (or equivalent)	Dual range: Normal: 0 – 500 ppm SO <sub>2</sub> SSM: 0 – 3,600 ppm SO <sub>2</sub>
Stack O <sub>2</sub>	Ametek Oxygen Analyzer (or equivalent)	920 (or equivalent)	Single range: $0 - 20.9 \% O_2$

# Pt. 60, App. B, Spec. 2, Section 1.0 (Stack Analyzers)

Initial compliance certification required only if the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

# System Maintenance and Malfunction

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above

In the event of a CEMS malfunction of greater than 24 hours:

- SO<sub>2</sub> in the exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Reich test or other method (e.g. portable analyzer).

- O<sub>2</sub> in the exit stack gas will be sampled and analyzed at least once per hour, during all Operating Hours. Sampling will be conducted by Orsat test or other method (e.g. portable analyzer)

- Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exception. Given that one or both of the stack CEMS is out of service, the most recent hourly reading(s) will be substituted for the 12 (24) five-minute readings that would otherwise be taken if the system was operating normally

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

# **System Modifications**

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

Dated November 22, 2011

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### EMISSION S RCES - MAXIMUM ALLOWABLE IISSION RATES

#### Permit Number 19282/PSDTX1081

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point	Source Name (2)	Air Contaminant	Emission Rates		
No. (1)		Name (3)	lbs/hour	TPY (4)	
		СО	1.75	7.65	
		H <sub>2</sub> SO <sub>4</sub> (7)	16.25	71.18	
		NO <sub>x</sub>	9.75	42.70	
		PM	3.36	14.72	
	•.	$PM_{10}$	3.36	14.72	
,		PM <sub>2.5</sub>	3.36	14.72	
		$SO_2$	325.03	806.65	
		Ag	0.022	0.095	
		As	0.068	0.297	
401	******	Ba	0.023	0.099	
101	Unit No. 8 Stack	Ве	0.014	0.063	
		Cd	0.014	0.063	
		Cl <sub>2</sub>	0.721	3.159	
		Cr	0.077	0.337	
	••	Hg	0.0004	0.002	
		Ni	0.061	0.267	
		Pb	0.032	0.141	
		Sb	0.037	0.158	
		Se	0.044	0.192	
		Tl	0.014	0.063	
102	Acid Pump Tank	SO <sub>2</sub>	0.01	0.01	
		СО	4.12		
·		NO <sub>x</sub>	4.90		
		PM	0.37		
103	Natural Gas Start Up Vent (9)	$PM_{10}$	0.37	· · · · · · · · · · · · · · · · · · ·	
		PM <sub>2,5</sub>	0.37		
		$SO_2$	0.03	•	
	·	VOC	0.27	ŧ	
		СО	4.12		
		$NO_x$	4.90		
• .		PM	0.37	4	
105	Natural Gas Start Up Vent (9)	$PM_{10}$	0.37		
	•	PM <sub>2.5</sub>	0.37		
		$SO_2$	0.03		
,		VOC	0.27		

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Emission Point		Air Contaminant	Emissi	on Rates
No. (1)	Source Name (2)	Name (3)	lbs/hour	TPY (4)
106	Natural Gas Start Up Vent (9)	CO NO <sub>x</sub> PM PM <sub>10</sub> PM <sub>2.5</sub> SO <sub>2</sub> VOC	4.12 4.90 0.37 0.37 0.37 0.03 0.27	
7 L L L L L L L L L L L L L L L L L L L	Annual Emission Cap (6) (EPNs 103, 105 and 106)	$CO$ $NO_x$ $PM$ $PM_{10}$ $PM_{2.5}$ $SO_2$ $VOC$		0.31 0.37 0.03 0.03 0.03 0.01 0.02
CATSCNU8 FE1	Catalyst Screening (8)  Process Fugitives (5)	PM PM <sub>10</sub> PM <sub>2.5</sub> SO <sub>2</sub>	0.01 0.01 0.01	0,01 0.01 0.01 0.03

- (1) Emission point identification either specific equipment designation or emission point number from plot
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) Ag silver
  - As arsenic
  - Ba barium
  - Be beryllium
  - Cd cadmium
  - Cl<sub>2</sub> chlorine
  - CO- carbon monoxide
  - Cr chromium
  - Hg mercury
  - H<sub>2</sub>SO<sub>4</sub> sulfuric acid mist
  - Ni nickel
  - NO<sub>x</sub> total oxides of nitrogen
  - Pb lead
  - PM total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented
  - PM<sub>10</sub> total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented
  - PM<sub>2.5</sub> particulate matter equal to or less than 2.5 microns in diameter
  - Sb antimony
  - Se selenium
  - SO<sub>2</sub> sulfur dioxide

Permit Number	19282/PSDTX
Page 3	

Tl - thallium

VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) 150 hours of operation on a rolling 12-month basis for EPNs 103, 105 and 106.
- (7) PSDTX1081 pollutant.
- (8) Planned maintenance, startup and shutdown activity only
- (9) Planned startup activity only

Emission rates are based	on and the faci	ities are limited	l by the following	maximum	operating:	schedule:

Hrs/day 24 Days/week 7 Weeks/year 52

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# AIR, PESTICIDES, AND TOXICS 6<sup>TH</sup> FLOOR RECORDS CENTER INFILING / NEW FILE FORM

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	New File		OR	Infiling		
Choose from the file typ	es below:					
AIR FACILITY:  AR - Acid Rain				.H - Asbesto esponse Ac	os Hazard En	nergency
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# **Program Management Files:**

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9<sup>th</sup> Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

EXR - External Relations

GEO - Geographical Summary Data

**GRA** - Grants Administration

The majority of this section requires the Fiscal Year accompany file code.

Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

OPP - Operating Permits Program

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

**REG** - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program

Bryan W. Shaw, Ph.D., Chairman Carlos Rubinstein, Commissioner Toby Baker, Commissioner Zak Covar, Executive Director



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 14, 2012

MR WILLIAM MCCONNELL PLANT MANAGER RHODIA INC 8615 MANCHESTER ST HOUSTON TX 77012-2142

Re: Permit Amendment Application

Permit Number: 19282 Rhodia Houston Plant Houston, Harris County

Regulated Entity Number: RN100220581 Customer Reference Number: CN600125330

Account Number: HG-0697-O

Associated Permit Number: PSDTX1081

RECEIVED

12 SEP 25 PM 4: 11

AIR PERMITS SECTIO

#### Dear Mr. McConnell:

This is in response to your letter received March 26, 2012 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 19282. We understand that you propose to replace the drying and oleum towers in the No. 8 production unit.

As indicated in Title 30 Texas Administrative Code § 116.116(b) [30 TAC § 116.116(b)], and based on our review, Permit Number 19282 is hereby amended. This information will be incorporated into the existing permit file. Enclosed is the revised maximum allowable emission rates (MAERT) table to replace those currently attached to your permit. There are no changes to the current special conditions of the permit.

Planned maintenance, startup, and shutdown emissions have been previously reviewed, authorized, and included in the MAERT. Any other maintenance activities are not authorized by this permit and will need to obtain a separate authorization.

This amendment will be automatically void upon the occurrence of any of the following, as indicated in 30 TAC § 116.120(a):

- 1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.
- 2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.
- 3. Failure to complete the changes authorized by this amendment within a reasonable time.

Mr. William McConnell Page 2 September 14, 2012

Re: Permit Number: 19282

Upon request, the executive director may grant extensions as allowed in 30 TAC § 116.120(b).

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the **effective date of the approval**. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Kyle Virr at (512) 239-1464 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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Mr. William McConnell Page 3 September 14, 2012

Re: Permit Number: 19282

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Michael Wilson, P.E., Director

Air Permits Division

Office of Air

Texas Commission on Environmental Quality

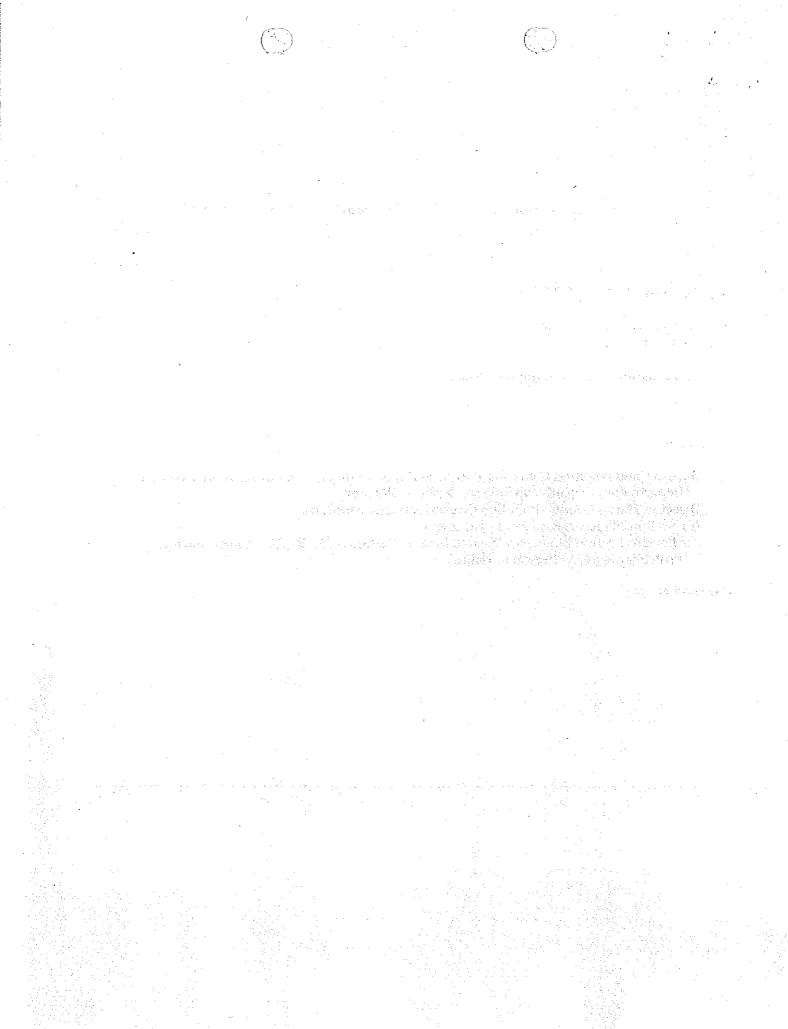
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**Enclosures** 

cc: Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston
Department of Health and Human Services, Houston
Director, Harris County, Pollution Control Services, Pasadena
Air Section Manager, Region 12 - Houston

Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 175781



# Permit Number 19282

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. Source Name (2)		Air Contaminant Name	Emission Rates		
	Source Name (2)		lbs/hour	TPY (4)	
101	Unit No. 8 Stack	СО	1.75	7.65	
		H2SO4 (7)	13.00	56.94	
		NOx	9.75	42.7	
		PM	3.36	14.72	
			PM10	3.36	14.72
		PM2.5	3.36	14.72	
	SO2	325.00	724.20		
		Ag	0.022	0.095	
		As	0.068	0.297	
		Ва	0.023	0.099	
		Ве	0.014	0.063	
		Cd	0.014	0.063	
		Cl2	0.721	3.159	
		Cr	0.077	0.337	
		Нд	0.0004	0.002	
		Ni	0.061	0.267	
		Pb	0.032	0.141	
		Sb	0.037	0.158	
		Se	0.044	0.192	
		Tl	0.014	0.063	

Project Number: 175781

Emission Point No.	Source Name (2)	Air Contaminant Name	Emission	Rates
		(3)	lbs/hour	TPY (4)
102	Acid Pump Tank	SO <sub>2</sub>	0.01	0.01
103	Natural Gas Start Up Vent (9)	CO	4.12	
		ÑOx	4.90	
		PM	0.37	
		PM10	0.37	
		PM2.5	0.37	
		SO <sub>2</sub>	0.03	
×		voc	0.27	
105	Natural Gas Start Up Vent (9)	CO La spanish di	4.12	
	e de la companya de l	NOx	4.90	
		PM ·	0.37	
	article	PM10	0.37	
	en de la companya de La companya de la co	PM2.5	0.37	
		SO2	0.03	
	. <u></u>	VOC	0.27	
106	Natural Gas Start Up Vent (9)	CO	4.12	
		NOx	4.90	
		PM	0.37	
		PM10	0.37	
	la calla de la composición del composición de la composición de la composición de la composición del composición de la c	PM2.5	0.37	
		SO2	0.03	
		voc	0.27	
	Annual Emission	co		0.31

Project Number: 175781

Emission Point No.		Air Contaminant Name	Emission	Rates	
(1)	Source Name (2)	(3)	lbs/hour	TPY(4)	
	Cap (6) (EPNs 103, 105 and	NOx		0.37	
	106)	PM		0.03	
		PM10		0.03	
		PM2.5		0.03	
		SO2		0.01	
		voc		0.02	
CATSCNU8	Catalyst Screening (8)	PM	0.01	0.01	
	(6)	PM10	0.01	0.01	
·		PM2.5	0.01	0.01	
FE1	Process Fugitives (5)	SO <sub>2</sub>	0.01	0.03	

plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) Exempt Solvent - Those carbon compounds or mixtures of carbon compounds used as solvents which have been excluded from the definition of volatile organic compound. - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1 VOC - highly reactive volatile organic compounds as defined in 30 TAC § 115.10 HRVOC - inorganic compounds (unspeciated) IOC-U - total oxides of nitrogen  $NO_x$ - sulfur dioxide  $SO_2$ - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as PMrepresented - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as

represented

- particulate matter equal to or less than 2.5 microns in diameter  $PM_{2.5}$ 

CO carbon monoxide

- hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code HAP of Federal Regulations Part 63, Subpart C

(4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.

(5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date:	September 14, 2012	

Project Number: 175781

 $PM_{10}$ 

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Print Form

# AIR, PESTICIDES, AND TOXICS 6<sup>TH</sup> FLOOR RECORDS CENTER INFILING / NEW FILE FORM

	New File		OR	Infiling	×.	
Choose from the file typ	es below:					
AIR FACILITY:			<u>TS</u>	CA:		
(				AH - Asbest Response A		nergency
( CB - Confidentia	l Business			AS or AW - Worker Prot		Asbestos
( CO - Compliance				CB - Confid		
EN - **Enforcen	nent		, Ç	FI - Site Sp		
( GE - General				FO - Non Si	•	
PE - Permit				]) IM - **Secti	· ·	
( RA - Regulatory Applicability				LB - **Lead		
Other				) PC - **PCB	•	
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# **Program Management Files:**

A current listing of these file types and their numeric codes are located in a blue binder on the top shelf of the "APT" file cabinet in the 9<sup>th</sup> Floor Records Center.

AIRS - Aerometric Information Retrieval System

ATO - Air Toxics

EMR - Emergency Response

ENF - Enforcement -

ENF 5-5-1 requires Month and Fiscal Year accompany file code.

ENF 5-6-5 requires Fiscal Year accompany file code.

EXR - External Relations

GEO - Geographical Summary Data

GRA - Grants Administration

The majority of this section requires the Fiscal Year accompany file code. Project Officer Grants require the Grant number and Fiscal Year accompany file code.

LAB - Laboratory Support

LBP - Lead Based Paint

LBP 12-3 requires the facility name in which document refers to be either highlighted or circled on the top page.

LEL - Legal and Legislative

MON - Monitoring NES - National Emission Standards

NSP - New Source Performance

NSR - New Source Review

OPP - Operating Permits Program

PEA - Permits Administration Program

PES - Pesticides

PLA - Planning

PUA - Public Affairs

RAD - Radiation

RCR - Resource Conservation and Recovery Act - Regulatory Development

RDE - Research and Development

REG - Registration

SIP - State Implementation Plan

SUP - Superfund

TITL - Title III

TSC - Toxic Substance Control

TSC 1-1-4 requires the facility name in which document refers to be either highlighted or circled on the top page.

TSU - Technical Support

VRP - Voluntary Reduction Program

Bryan W. Shaw, Ph.D., Chairma, Buddy Garcia, Commissioner Carlos Rubinstein, Commissioner Mark R. Vickery, P.G., Executive Director



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 10, 2012

MR FLOYD DICKERSON ENVIRONMENTAL MANAGER RHODIA INC 8615 MANCHESTER ST HOUSTON TX 77012-2142

Re: Permit Amendment Application

Permit Numbers: 4802 and PSDTX1260

Regeneration Unit No 2 Houston, Harris County

Regulated Entity Number: RN100220581 Customer Reference Number: CN600125330

Account Number: HG-0697-O

Dear Mr. Dickerson:

This is in response to your letter received June 6, 2011 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 4802 and issuance of Permit PSDTX1260. We understand you propose to increase daily sulfuric acid production, install a caustic scrubber to reduce existing sulfur dioxide emissions and authorize increased sulfuric acid mist emissions.

As indicated in Title 30 Texas Administrative Code § 116.116(b) [30 TAC § 116.116(b)], and based on our review, Permit Number 4802 is hereby amended and Permit Number PSDTX1260 is issued. This information will be incorporated into the existing permit file. Enclosed are revised special conditions pages and a maximum allowable emission rates (MAERT) table to replace those currently attached to your permit. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met.

Planned maintenance, startup, and shutdown for the sources identified on the MAERT have been reviewed and included in the MAERT and specific maintenance activities are identified in the permit special conditions. Any other maintenance activities are not authorized by this permit and will need to obtain separate authorization.

Mr. Floyd Dickerson Page 2 February 10, 2012

Re: Permit Numbers: 4802 and PSDTX1260

This amendment will be automatically void upon the occurrence of any of the following, as indicated in 30 TAC § 116.120(a):

- 1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.
- 2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.
- 3. Failure to complete the changes authorized by this amendment within a reasonable time.

Upon request, the executive director may grant extensions as allowed in 30 TAC § 116.120(b).

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

www.tceq.texas.gov/compliance/compliance support/qa/env lab accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.texas.gov.

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

Mr. Floyd Dickerson Page 3 February 10, 2012

Re: Permit Numbers: 4802 and PSDTX1260

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the <u>effective date of the approval</u>. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Stephen E. Anderson, P.E. at (512) 239-1287 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Michael Wilson, P.E., Director

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Air Permits Division

Office of Air

Texas Commission on Environmental Quality

MPW/SEA

**Enclosures** 

cc: Air Section Manager, Region 12 - Houston

Director, Environmental Public Health Division, Harris County Public Health and Environmental Services, Pasadena

Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston Department of Health and Human Services, Houston

Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Numbers: 166270 and 166724

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#### SPECIAL CONDITIONS

#### Permit Number 4802/PSDTX1260

#### **Emission Standards**

- 1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources- Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
- 2. Complaints from affected persons of nuisance odors from the site verified by the Texas Commission on Environmental Quality (TCEQ) or any air pollution control agency with appropriate jurisdiction shall be the basis for requiring prompt remedial action to eliminate such odors. The TCEQ may require these facilities to implement one or more of the following measures: temporary production curtailment; temporary shutdown during adverse meteorological conditions; install any additional controls that are necessary to control odor emissions, etc., according to a schedule determined by TCEQ. (08/10)
- 3. The sulfur dioxide (SO<sub>2</sub>) emissions from Regeneration Unit No. 2 shall not exceed 15 tons measured over any continuous 24-hour period prior to April 1, 2014. The holder of this permit shall maintain equipment as described in its permit application which will automatically cause the operation of Regeneration Unit No. 2 to cease if the SO<sub>2</sub> emissions exceed for a 30-minute period at a rate which would cause more than 15 tons of SO<sub>2</sub> to be emitted over a 24-hour period prior to April 1, 2014. (02/12)

 $SO_2$  emission limits will be limited to the following emission rates: (02/12)

Short term: 3.0 pounds of SO<sub>2</sub> per ton of one hundred present acid produced. Long term: 1.8 pounds of SO<sub>2</sub> per ton of one hundred percent acid produced. Long term SO<sub>2</sub> emission limits will become effective 365 days from April 1, 2014.

H<sub>2</sub>SO<sub>4</sub> mist is limited to 0.15 pound per ton of produced H<sub>2</sub>SO<sub>4</sub> on an hourly maximum basis and 0.10 pound per ton of produced H<sub>2</sub>SO<sub>4</sub> on an annual average basis prior to April 1, 2014 from EPN 104. EPN 104 shall be permanently shut down prior to April 1, 2014. H<sub>2</sub>SO<sub>4</sub> mist is limited to 0.15 pound per ton of produced H<sub>2</sub>SO<sub>4</sub> on an hourly maximum basis and 0.10 pounds per ton of produced H<sub>2</sub>SO<sub>4</sub> on an annual average basis on and after April 1, 2014 from EPN 104 upon installation completion of the proposed emission abatement equipment. New EPN 104 shall be operable on and after April 1, 2014. **(02/12) (PSD)** 

Failure to install this emission abatement equipment by April 1, 2014 shall require operation of these permitted facilities to cease and these permitted facilities shall not operate until this abatement equipment is installed and operating properly. (02/12) (PSD)

H<sub>2</sub>SO<sub>4</sub> production is limited 969 tons per day prior to completion of installation and operation of the represented emission abatement equipment pursuant to this special condition. The increase in H<sub>2</sub>SO<sub>4</sub> production to 1,150 tons per day shall not be effective until all represented emission abatement equipment required by this special condition is completely installed and operating properly. (02/12) (PSD)

The holder of this permit shall keep records of the daily production of H<sub>2</sub>SO<sub>4</sub> and the one-hour SO<sub>2</sub> emissions rates for each day before and after completion of installation of the emission abatement equipment required by this special condition. Records shall be made readily available to TCEQ personnel upon request, the U.S. Environmental Protection Agency (EPA) personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO<sub>2</sub> emissions limitations specified in the maximum allowable emissions rates table (MAERT). (02/12) (PSD)

4. Opacity of emissions from the Unit No. 2 Stack shall not exceed 20 percent averaged over a five-minute period up to April 1, 2014.

# Federal Program Requirements

- 5. These facilities shall comply with all applicable requirements of EPA regulations on Standards of Performance for New Stationary Sources promulgated for the following: (02/12)
  - A. Emission Guidelines and Compliance Times for Sulfuric Acid Production Units in 40 CFR Part 60, Subparts A and Cd.
  - B. Standards of Performance for Sulfuric Acid Plants in 40 CFR Part 60, Subparts A and
  - C. Volatile Organic Liquid Storage Vessels in 40 CFR Part 60, Subparts A and Kb only apply to Storage Tanks 48, 49, 53, B1 and B2.

These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants promulgated for Benzene Waste Operations in Title 40 Code of Federal

SPECIAL CONDITIONS Permit Number 4802/PSDTX1260 Page 3

Regulations (40 CFR) Part 61, Subparts A and FF.

These facilities shall comply with all applicable requirements of Title 30 Texas Administrative Code (30 TAC) § 113.120 (including the referenced requirements contained in 40 CFR Part 63, Subpart G, § 113.550 (including the referenced requirements contained in 40 CFR Part 63 Subpart XX) and 113.640 (including the referenced requirements contained in 40 CFR Part 63, Subpart GGG). (12/08)

## Operational Requirements

- 6. The No. 2 regeneration heater is limited to 1,000 hours per rolling 12-months of operation. Fuel for this heater is limited to pipeline-quality, sweet natural gas as defined in 30 TAC Chapter 101. Records shall be updated quarterly to demonstrate compliance with this special condition.
- 7. The use of compounds at the Regeneration Unit No. 2 (EPN 104) is limited to those identified in the attached Approved Chemical List. Modifications or construction of new facilities at this site that result in emission increases of one or more chemicals in the Approved Chemical List dated February 2012, or from chemicals currently in use and previously authorized through this special condition can only be approved through use of this special condition. Any construction of new equipment that occurs through the use of adding a new chemical is not allowed through this special condition. New chemical(s) may also be added through use of a permit by rule claim and/or registration under 30 TAC Chapter 106 or use of the qualified facilities requirements in 30 TAC Chapter 116. (02/12)
  - A. Short-term (pounds per hour [lb/hr]) and annual (tons per year) emissions and calculations shall be completed for each chemical at each affected source; emission rates shall be calculated in accordance with the methods documented in the permit amendment application (PI-1 dated September 4, 2003). The calculated emission rates shall not exceed the maximum allowable emission rate at any emission point.
  - B. The Effect Screening Level (ESL) for the chemical shall be obtained from the current Texas Commission on Environmental Quality (TCEQ) ESL list or by written request to the TCEQ Toxicology Division.
  - C. The total emissions of any compound from all emission points in this permit must satisfy one of the following conditions:

- (1) The total maximum emission rate from all sources is less than 0.04 lb/hr and the ESL greater than 2 ug/m<sup>3</sup>; or
- (2) Case specific criteria based on modeling performed on July 30, 2004.

# $(ER/ESL)_N \le (ER/ESL)_E$

- (ER/ESL)<sub>N</sub> = plant-wide maximum hourly emission rate based on maximum vapor pressure of new compound(s) divided by its ESL.
- (ER/ESL)<sub>E</sub> = the highest ratio of any previously authorized compounds plant-wide hourly emission rate based on maximum vapor pressure divided by its ESL (i.e., 0.261).
- D. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:
  - (1) Chemical name(s), composition, and chemical abstract registry number if available.
  - (2) Molecular weight.
  - (3) Storage tanks, loading areas, and loading fugitive areas where the material is to be handled and the emission control device to be utilized.
  - (4) Date new compound handling commenced.
  - (5) Material Safety Data Sheet.
  - (6) A copy of the referenced July 2004, modeling report shall be kept on-site and made available to TCEQ personnel and any local air pollution program with jurisdiction.

# Planned Maintenance, Startup and Shutdown (MSS)

8. A. This permit authorizes emissions from spent sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) Storage Tanks 48, 49, 53 and 56 and from four spent H<sub>2</sub>SO<sub>4</sub> storage tank truck depressurizations in any one hour and 12,786 spent H<sub>2</sub>SO<sub>4</sub> storage tank truck depressurizations in any rolling 12 months when the Regeneration Unit No. 2 Furnace, EPN 104, is shut down for the following planned maintenance, start-up, and shutdown (maintenance, start-up and shutdown) activities: (08/10)

Planned unit shut down for process equipment gas leak repairs, planned maintenance turnarounds and general plant preventative planned maintenance shutdowns up to a maximum of 1,314 hours per rolling 12 months.

During these planned downtime events, the emissions from the listed fixed-roof storage tanks and spent tank truck depressurizing activities shall be routed to the existing caustic scrubber and then directed to the inlet of Vapor Combustor, EPN 170, up to 1,314 hours per rolling 12-months.

A maximum of eight railcars can be depressurized at any one time, and the depressurizing vent stream(s) shall be vented to the No. 2 Regeneration Furnace designated as EPN 104 and can be directed to the caustic scrubber and then vented from the caustic scrubber to the Vapor Combustor identified as EPN 170 when the No. 2 Regeneration Furnace is down. The number of railcars depressurized in a rolling 12-month period is limited to 910 and shall be vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the caustic scrubber and then vented from the caustic scrubber to a Vapor Combustor identified as EPN 170 when the No. 2 Regeneration Furnace is down up to 1,314 hours per calendar year. (02/12)

The Vapor Combustor, EPN 120, shall receive waste gas streams when the Regeneration Unit No. 2 Furnace is not operating up to 1,314 hours per rolling 12-month period. A maximum of two hazardous waste tank trucks can be depressurized in any one hour and 550 truck depressurizations in any rolling 12-month period and vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is down up to 1,314 hours per calendar year.

A maximum of two hazardous waste railcars can be depressurized in any one hour and 65 railcar depressurizations in any rolling 12-month period and vented to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is down up to 1,314 hours per calendar year.

Emissions from planned unit shutdown for process gas leak repairs at EPN 104 planned maintenance turnarounds at EPN 104 and general plant preventative planned maintenance shutdowns at EPN 104 will be directed to EPN 120 up to a maximum of 1,314 hours per rolling 12-months.

B. This permit authorizes emissions from EPNs 170, TKINSPMSS1, and TKINSPMSS2 for the following planned MSS activities at Storage Tanks 48, 49, 53, 56, and 78. (08/10)

A maximum of three inspections can be conducted for the group of spent acid Storage Tanks designated as 48, 49, 53, and 56 each calendar year and a maximum of two inspections can be conducted for spent acid Storage Tank 78 each calendar year. Any liquid or solid residual from each storage tank will be removed prior to or after each tank is degassed. The represented tank degassing is limited to 1,032 hours per rolling 12 months.

Any gas or vapor removed from process equipment or storage vessels must be routed to the Regeneration Unit No. 2 caustic scrubber for removal of sulfur dioxide at 99.9 percent immediately followed by the vapor combustor designated as EPN 170 for control of volatile organic compounds (VOC) at 98.0 percent (option one) or alternatively to a portable caustic scrubber for removal of SO<sub>2</sub> at 99.0 percent immediately followed by a portable vapor combustor for VOC destruction at 98.0 percent (option two). The portable caustic scrubber pH shall be kept at a minimum of 9.0 and shall be monitored once a day. A sufficient inventory of fresh caustic shall be kept on site during the use of the portable caustic scrubber when each storage tank undergoes a planned MSS activity.

Option one controls shall not be used to degas Storage Tank 78. Options one and two operating time is each limited to 360 hours per rolling 12 months for Storage Tanks 48, 49, 53, and 56. Option two operating time is limited to 672 hours per rolling 12 months for Storage Tank 78.

Option one or option two control must be maintained until the VOC concentration is less than 34,000 parts per million volume (ppmv) as methane in the storage tank undergoing planned MSS. Each represented storage tank shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the designated option one and/or option two represented emission controls to the extent allowed by process equipment or storage vessel design. The locations and/or identifiers where the purge or liquid flush material enters the storage vessel and the exit points for the exhaust gases shall be recorded.

C. This permit authorizes emissions from EPNs (MSS-HAZTK1 and MSS-HAZTK2) for the following planned MSS activities at Hazardous Waste Tanks (B1, B2, F2, F3, H1 and H2) and bullet tank T554: (12/08)

A maximum of two shutdowns, degassing, and cleaning events can be conducted for Tanks F2, F3, and T554 and two shutdowns, degassing, and cleaning events for tanks the equivalent size of Tanks B1 or B2 and two shutdowns, degassing, and cleaning events for tank the equivalent size of H1 or H2 each calendar year. These tank MSS activities are limited to 840 hours per rolling 12 months.

Each tank will be degassed to EPN 104, prior to being drained and flushed. Each tank will be drained and flushed by water a minimum of three times and emissions must be routed to the Regeneration Unit No. 2 Industrial Furnace (EPN 104) until the VOC concentration is less than 400 ppmv. If the Industrial Furnace (EPN 104) is not available, then these emissions must be routed to the vapor combustor, EPN 120. The vapor combustor must achieve 98 percent control efficiency for VOC and the industrial furnace must achieve 99.9999 percent control efficiency for VOC. Any wastewater will be pumped into another hazardous waste storage tank and will be burned in the industrial furnace in Regeneration Unit No. 2 (EPN 104). The outlet VOC concentration from the tanks after final nitrogen purge shall be below 20 ppmv. The purge rate of the blower shall not exceed 500 CFM at ambient temperature.

- D. Catalyst converter planned MSS activity is limited to 218 hours per rolling twelve months from EPN CATSCNR2. Planned MSS generated particulate emissions shall be directed to a bag filter. Outlet bag filter grain loading shall be limited to a maximum of 0.01 grains per dry standard cubic foot. (02/12)
- E. Only these planned MSS activities described in this condition are authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the maintenance, start-up, and shutdown (MAERT). The performance of each planned maintenance activity and emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis. These records shall include at least the following information: (02/12)
  - (1) the physical location at which emissions from the planned MSS activity occurred, including the emission point number, common name, and any other identifier for the point at which the emissions were released into the atmosphere;
  - (2) the type of planned MSS activity and the reason for the planned activity;
  - (3) the common name and the facility identification number of the facilities at which the planned MSS activity and emissions occurred;

# SPECIAL CONDITIONS Permit Number 4802/PSDTX1260 Page 8

- (4) the date and time of the planned MSS activity and its duration;
- the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it.

  The emissions shall be estimated using the methods identified in the amendment application, PI-1 dated December 15, 2006,

  December 17, 2007 and May 31, 2011, consistent with good engineering practice.

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### Process Fugitive Monitoring Programs

- 9. 28PI Piping, Valves, Pumps and Compressors in Spent H<sub>2</sub>SO<sub>4</sub> and SO<sub>2</sub> Service (2/07)
  - A. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute, American Petroleum Institute, American Society of Mechanical Engineers, or equivalent codes.
  - B. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
  - C. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Non-accessible valves, as defined in 30 TAC Chapter 115, shall be identified in a list to be made available upon request.
  - D. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. Except during sampling, the second valve shall be closed.
  - E. All piping components shall be inspected by visual, audible, and/or olfactory means at least once a week by operating personnel walk-through.
  - F. Damaged or leaking valves, connectors, compressor seals, and pump seals found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair a leaking component as specified in this paragraph within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot

- tagging. At the discretion of the TCEQ Executive Director or designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.
- G. Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the TCEQ upon request.

# <u>Piping, Valves, Connectors, Pumps and Compressors in VOC Service for Hazardous Waste Operations</u>

- 10. The permittee shall comply with these requirements for all equipment items, except relief valves, which contact hazardous or specified non-hazardous wastes or vapors from these wastes:
  - A. All valves and piping shall be above ground and so located as to be reasonably accessible for leak checking during plant operation.
  - B. Piping connections shall be welded or flanged. Flanges and flange gaskets shall be of the design and quality that the potential for fugitive losses is minimized.
  - C. All pumps shall be sealless or equipped with double mechanical seals using an oil or water based barrier fluid which operates at a pressure higher than the process pressure.
  - D. All valves shall be designed, constructed, and tested by the manufacturer for leak-free performance.
  - E. New and reworked valves installed as replacements shall be tested prior to operation by hydrostatic or gas testing in-place or by an appropriate bench test to determine that the valves do not leak.
  - F. Prior to the initial burning of hazardous waste and annually thereafter, all pumps, valves, and flanges shall be hydrotested or gas-tested at 100 percent or more the maximum operating pressure and adjustments made as necessary to obtain bubble-tight, leak-free performance.
  - G. All pumps, valves, and flanges shall be monitored monthly with a hydrocarbon gas analyzer. Monitored values which are greater than 25 parts per million (ppm) above any background concentration when measured at a distance of less than three inches shall be considered evidence of a leak.

# SPECIAL CONDITIONS Permit Number 4802/PSDTX1260 Page 10

(1) In lieu of the monthly monitoring frequency specified in Special Condition No. 9G, pumps, valves, and flanges may be monitored on a quarterly basis if the leak percentages of these components for three consecutive monthly monitoring periods is less than 0.2 percent.

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If the leak percentage for any quarterly monitoring period is 0.2 percent or greater, the facility shall revert to monthly monitoring for pumps, valves, and flanges until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

(2) The leak percentage shall be determined by using the following formula:

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$$(Cl_1 + Cs_1) \times 100/Ct_1 = Cp_1$$

#### Where:

- Cl<sub>1</sub> = the number of pumps, valves, and flanges found leaking by the end of the monitoring period.
- $\mathrm{Cs}_1=$  the number of pumps, valves, and flanges for which repair has been delayed and are listed on the facility shutdown log.
  - Ct<sub>1</sub> = the total number of pumps, valves, and flanges in the facility subject to the monitoring requirements, as of the last day of the monitoring period.
  - Cp<sub>1</sub> = the percentage of leaking pumps, valves, and flanges for the monitoring period.

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- H. All agitator seals shall be monitored monthly with a hydrocarbon gas analyzer. Monitored values which are greater than 25 ppm above any background concentration when measured at a distance of less than three inches shall be considered evidence of a leak.
  - (1) In lieu of the monthly monitoring frequency specified Special Condition No. 9H agitator seals may be monitored on a quarterly basis if the leak percentages of these components for three consecutive monthly monitoring periods is less than 0.2 percent.

If the leak percentage for any quarterly monitoring period is 0.2 percent or greater, the facility shall revert to monthly monitoring for agitator seals until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

(2) The leak percentage used in paragraph H(1) shall be determined using the following formula:

$$(Cl_2 + Cs_2) \times 100/Ct_2 = Cp_2$$

Where:

Cl<sub>2</sub> = the number of agitator seals found leaking by the end of the monitoring period

Cs<sub>2</sub> = the number of agitator seals for which repair has been delayed and are listed on the facility shutdown log.

Ct<sub>2</sub> = the total number of agitator seals in the facility subject to the monitoring requirements, as of the last day of the monitoring period.

 $Cp_2$  = the percentage of agitator seals for the monitoring period.

- I. All agitator seals, pumps, valves, and flanges shall be inspected on a daily basis and shall be monitored if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. Monitored values which are greater than 25 ppm above any three inches shall be considered evidence of a leak. Visible presence of the leaking waste liquid shall always constitute a leak and, therefore, will not necessitate the use of a monitor for detection purposes.
- J. Two continuous ambient hydrocarbon monitors shall be installed, maintained and operated around the perimeter of each of the storage modules for the purpose of identifying fugitive leaks. Each monitor shall alarm at: (4/07)
  - (1) Calculated hourly averages above 25 ppm; or
  - (2) An instantaneous value above 25 ppm; and
  - (3) An alarm shall result in both an immediate search for leaking equipment by personnel using portable monitors and a written record of the conclusion of that search.

If the hourly average remains above 25 ppm and the initial search was negative, additional searches need not be conducted except on 24-hour intervals.

Alternate, equivalent methods or additions to these required methods for identifying fugitive leaks may be approved by the Executive Director of the TCEQ upon written request by the permittee.

Hand held monitors meeting Method 21 monitoring requirements can be used to monitor for process fugitive leaks during periods when the hydrocarbon monitors are out of service.

K. Leaking equipment shall be repaired or isolated within four hours after detection, except for valves connected directly to tanks, which are allowed four hours after the affected tank has been emptied and decontaminated. Emptying and decontamination of the affected tank shall be initiated immediately after the detection of a leak. Equipment shall not be returned to service until the leak is repaired.

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- L. The repair and maintenance of any equipment component shall be assisted by use of a hydrocarbon gas analyzer such that a minimum concentration of leaking hydrocarbons is achieved and that the resulting concentration is less than 25 ppm above any background concentration when measured at a distance of less than three inches. An acceptable alternative of demonstrating VOC to be less than 25 ppm is to pressure test with nitrogen up to 125 pounds per square inch. If there is no drop in pressure over a 15 minute period, the equivalent 25 ppm threshold is satisfied.
- M. The holder of this permit shall operate and maintain all portable hydrocarbon gas analyzers to meet the performance specifications, field tests, and calibrations as found in 40 CFR § 264.1063. Alternate, equivalent equipment items, operating modes, and maintenance activities may be approved by the Executive Director of the TCEQ upon written request by the permittee.
- N. Records of monitoring and maintenance actions, required by the Special Condition No. 9 of this permit shall be maintained for a period of three years, shall be made available to authorized state and local air pollution control agencies, and shall include, at a minimum, the following data:
  - (1) A list of all components affected by this special condition;
  - (2) Checklists indicating the daily inspections are being performed;
  - (3) Checklists indicating the monthly inspections are being performed;

# SPECIAL CONDITIONS Permit Number 4802/PSDTX1260 Page 13

- (3) Checklists indicating the monthly inspections are being performed;
- (4) Checklists indicating the annual inspections are being performed;
- (5) Checklists indicating the continuous ambient monitors are being operated and maintained;
- (6) Summaries including the date, time, equipment identification, and monitoring results for all leaking items;
- (7) Summaries including the date, time, equipment identification, and corrective actions for all isolations, replacements and/or repairs performed, including monitoring results immediately after repairs; and
- (8) Records of the calibration of the portable and continuous monitoring instruments.

(Note: Checklist and summaries may be computerized but shall be verified by signed writing confirming that the required checks were completed.)

# Vapor Combustor

- 11. A. Vents from Fixed-Roof Storage Tanks designated as B1, B2, F2, F3, H1, H2 and Tank 554 and hazardous waste truck and railcar depressurizations shall vent to the Regeneration No. 2 Furnace designated as EPN 104 when it operates and these tank vents and depressurizations shall be directed to the Vapor Combustor designated as EPN 120 up to 1,314 hours per rolling 12 months when EPN 104 is not operable. (12/08)
  - B. The MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) from Tanks F2, F3, and T554 and the MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) for the equivalent size Tanks B1 or B2 and MSS emissions (two shutdowns, degassing, and cleaning events per calendar year) for the equivalent size Tanks H1 or H2 shall vent to the Regeneration Unit No. 2 Furnace designated as EPN 104 when it operates and shall be directed to the Vapor Combustor designated as EPN 120 when EPN 104 is not operable. These tank MSS activities are limited to 840 hours per rolling 12 months. (12/08)
- 12. Vents from Tanks 48, 49, 53 and 56 and spent tank truck depressurizations shall be vented to the Regeneration No. 2 Furnace designated as EPN 104 when it operates and these tank vents and depressurizations shall be directed to the Vapor Combustor designated as EPN 170 up to 1,314 hours per rolling 12-months when EPN 104 is not operable. A maximum of four tank trucks can be depressurized in one hour to the represented emission controls. (4/07)

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> Storage Tank Vent 78 and spent railcar depressurizations shall vent to the No. 2 Regeneration Furnaces designated as EPN 104 and can be directed to the caustic scrubber and then routed to the Vapor Combustor designated as EPN 170 when the No. 2 Regeneration Furnace is down up to 1,314 hours per calendar year. The caustic scrubber outlet vent shall be directed to the inlet of EPN 170. (3/06)

13. Each Vapor Combustor designated EPNs 120 170 and the portable vapor combustor designated as EPN TKINSPMSS2 shall be equipped with a continuously burning pilot system or other automatic ignition system that assures combustor ignition and that provides immediate notification of appropriate supervisory personnel when the ignition system ceases to function properly. (4/07)

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### Initial Determination of Compliance

- Sampling ports and platform(s) shall be incorporated into the design of the Vapor 14. Combustor Stack designated as EPN 170 and Regeneration Unit No. 2 Stack designated as EPN 104 according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Director. (02/12)
- The holder of this permit shall perform stack sampling and other testing as required to 15. establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Vapor Combustor (EPN 170) and Regeneration Unit No. 2 Stack (EPN 104). The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. (02/12) (PSD)
  - The appropriate TCEO Regional Office in the region where the source is located A. shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- Trest es **as ú**na como que el cuas el 1900 de monto en contrata el como de contrata el Date for pretest meeting, (1)
- Date sampling will occur, (2)
- Name of firm conducting sampling, (3)
- Type of sampling equipment to be used, and (4)
- Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

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A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures. Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standards testing, which must have the EPA approval, shall be submitted to the TCEQ Regional Director.

B. Air contaminants emitted from the Vapor Combustor (EPN 170) to be tested for include (but are not limited to) VOC.

Air contaminants emitted from the Regeneration Unit No. 2 Stack (EPN 104) to be tested for include (but are not limited to) CO, H<sub>2</sub>SO<sub>4</sub> mist, NO<sub>x</sub>, PM and SO<sub>2</sub>. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1 and 3. Stack testing of EPN 104 shall be completed between 90 days and 180 days after installation of the emission abatement equipment required by Special Condition No. 3. (02/12) (PSD)

- C. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires the EPA approval, and requests shall be submitted to the TCEQ Regional Director.
- D. The plant shall operate at maximum production (or loading) rates during stack emission testing. The stack test will be conducted under the combination of the maximum conditions as identified in the MAERT as Vapor Combustor 2-Normal plus Vapor Combustor 2-Standby (maintenance). Primary operating parameters that enable determination of production rate (or loading rate) and combustor operating parameters shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting. If the plant is unable to operate at maximum rates during testing, then future production (or loading) rates may be limited to the rates established during testing. Additional stack testing may be required when higher production rates are achieved. The combustor operating parameters during testing shall be used to set the normal operating conditions until the next stack test is performed.

The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permittee) for the H<sub>2</sub>SO<sub>4</sub> Regeneration Unit No. 2 at the time of testing for EPN 104. This H<sub>2</sub>SO<sub>4</sub> production rate shall be monitored and recorded during the stack test of EPN 104. If the normal production rate of H<sub>2</sub>SO<sub>4</sub> from the Regeneration Unit No. 2 exceeds by more than 10 percent the tons per day maintained during sampling of EPN 104, the permit holder must notify, in writing, the appropriate TCEQ Regional Office, and the source may be subject to additional sampling to demonstrate continued compliance. (02/12) (PSD)

E. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. One copy of the final sampling report shall be distributed as follows within 60 days after sampling is completed. (02/12) (PSD)

The appropriate TCEQ Regional Office; each applicable local air pollution control program, and EPA Region 6 New Source Review in Dallas (EPN 104 only)

F. A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or EPA sampling procedures and any written contact as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting shall be sent to each applicable local air pollution control program with jurisdiction in conjunction with paragraph A of this special condition. Requests for additional time to perform sampling in conjunction with paragraph C of this special condition shall be sent to each applicable local air pollution control program with jurisdiction.

# Continuous Demonstration of Compliance

- 16. The industrial furnace shall not emit non-sulfate particulate matter in excess of 0.02 grain per dry standard cubic feet when corrected for the amount of oxygen in the stack gas in accordance with the formula specified in 40 CFR § 264.343(c). Corrections for the amount of sulfate particulate in the stack gas shall conform to the procedures specified in the TCEQ Laboratory Methods Manual.
- 17. The following requirements apply to capture systems for EPN 104 emitting SO<sub>2</sub>. (02/12)
  - A. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system;
  - B. The control device shall not have a bypass.

### SPECIAL CONDITIONS Permit Number 4802/PSDTX1260 Page 17

- C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.
- 18. The minimum liquid flow to the absorber (EPN 104) shall be 200 gallons per minute (gpm). The circulation rate shall be monitored and recorded at least once a day. (02/12) (PSD)

The liquid flow rate shall be recorded at least once an hour.

The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

The minimum pH on the second stage of the scrubber's scrubbing solution downstream of the Brinks mist filter is 5.0. This pH shall be analyzed and recorded at least once a day.

Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent, and shall be accurate to within 0.5 pH unit. Quality-assured (or valid) data must be generated when the facility generating emissions are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the facility generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

- 19. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO<sub>2</sub> and the total gas flow rate from the Regeneration Unit No. 2 Stack (EPN 104) on and after April 1, 2014. (02/12) (PSD)
  - A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ±5 percent from the tagged cylinder gas value.

# SPECIAL CONDITIONS Permit Number 4802/PSDTX1260 Page 18

- B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO<sub>2</sub> per hour at least once every month.
- C. All monitoring data and quality assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ personnel, EPA personnel or any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO<sub>2</sub> emission limits specified in MAERT.
- D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace, but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments. (02/12)
- E. The CEMS shall be used to demonstrate compliance with the SO<sub>2</sub> emission limits as found in Special Condition No. 3. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the Alternate Monitoring Plan (Attachment A). (02/12)
  - (1) The SO<sub>2</sub> CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO<sub>2</sub> emission rate in units of pounds per ton of one hundred percent acid produced.
  - (2) The SO<sub>2</sub> CEMS shall monitor and record the SO<sub>2</sub> emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
  - (3) Implementation of the monitoring requirements has been defined in the Alternate Monitoring Plan (AMP) for the SO<sub>2</sub> CEMS system.
  - (4) The AMP supersedes the corresponding SO<sub>2</sub> monitoring requirements of NSPS Subpart H.
  - (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
  - (6) In the event of CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 3 according to the procedures specified in the AMP.

Dated: February 10, 2012

# Alternative Monitoring Plan for SO<sub>2</sub> Emissions Rhodia Inc. Houston, TX Unit 2 Single Absorption Sulfuric Acid Regeneration Plant with Scrubber

# Justification for Using an Alternative Monitoring Plan (AMP) for SO<sub>2</sub> emissions

The regulations that established the NSPS for sulfuric acid plants are over 30 years old. At the time, the regulatory standard was established as 4 lb of SO<sub>2</sub> emissions per ton of 100 % sulfuric acid produced, and compliance with the standard was to be demonstrated using a calculation similar to Equation 1 below. Regulations required the use of a CEMS to measure SO<sub>2</sub> concentration at the stack (M2), but only required measurement of SO<sub>2</sub> entering the converter by suitable method three times per calendar day. Plants typically rely on the use of a Reich test once per shift to establish the SO<sub>2</sub> concentration entering the converter (M1). While the stack measurement represented a nearly continuous real time indication of the stack concentration, performing a Reich test once per shift for the converter inlet concentration provides little more than a random sample once every eight hours.

The methodology proposed in this AMP will provide a more continuous real-time indication of compliance by using a process analyzer to measure the converter inlet SO<sub>2</sub> concentration. While this analyzer will be nearly identical to the CEMS that is commonly used at the stack, it will not be able to meet all of the standards that are usually applied to a CEMS because of the process conditions and / or physical limitations of an existing facility. For example, it is not feasible to modify the existing ductwork around the analyzer to meet the normal guidelines for straight runs of pipe upstream / downstream of the analyzer. We believe that the disadvantages (places where the analyzer is not quite up to CEMS standards) are far outweighed by the advantages of using a real time instrument, rather than a periodic Reich test, to measure the converter inlet concentration. Rhodia will use best professional judgment to ensure the analyzer located at the converter inlet provides representative data.

Except as noted in this document, the objective of this proposed AMP is to maintain the process analyzer at the converter inlet in a manner that is similar to the stack CEMS, as set forth in 40 CFR Part 60, Appendix B and F.

#### **Definitions**

"CEMS" or "Continuous Emission Monitoring System" shall mean equipment that continuously measures and records the concentration and/or emission rate of a pollutant, in the units specified by the emission limit concerned

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"Long-Term Limit" shall mean a sulfur dioxide (SO<sub>2</sub>) emission limit for a sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("lbs/ton"), averaged over all Operating Hours in a rolling 365-day period.

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"Malfunction" shall mean, consistent with 40 C.F.R. § 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor maintenance or careless operation. 

"Operating Hours" shall mean periods during which sulfur or sulfur-bearing compounds. excluding conventional fossil fuels such as natural gas or fuel oil, are being fed to the furnace.

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"Short-Term Limit" shall mean the SO<sub>2</sub> emission limit for each sulfuric acid plant expressed as pounds per ton of 100% sulfuric acid produced ("Ibs/ton"), averaged over each rolling 3-hour period. Except for periods of Startup, Shutdown and Malfunction, the Short-Term Limits established under this Consent Decree shall apply at all times. 

"Shutdown" shall mean the cessation of operation of a sulfuric acid plant for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace ceases

"Startup" shall mean the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oil, to the furnace commences after a main gas blower shutdown.

## Part 60.84 Emissions Monitoring.

Compliance with the Long-Term Limit and Short-Term Limit defined by the Consent Decree will be demonstrated using SO<sub>2</sub> analyzers at the converter inlet and exit stack using the following equation. Refer to additional discussion below the equation for specific details related to data input and calculation.

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### Equation 1

$$Xe = (M1 - M2)/(M1 - 1.5 \times M1 \times M2)$$
  
 $E = (K / Xe) - K$ 

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### Where:

Xe = fractional conversion efficiency

M1 = fractional concentration of SO<sub>2</sub> entering the converter

M2 = fractional concentration of  $SO_2$  at the stack

 $E = SO_2$  emission rate in lb / ton of 100 % acid produced

 $K = 1306 = (2000 \text{ lb / ton}) \times (64 \text{ lb / lbmol SO2})/(98 \text{ lb / lbmol } H_2SO_4)$ 

## Short-Term Limit

The following procedure and calculation will be performed once every five minutes during all Operating Hours, except periods of Startup, Shutdown or Malfunction, to demonstrate compliance with the Short-Term Limit for SO<sub>2</sub>.

- At any given time the system will maintain an array consisting of the 36 most recent samples of the SO<sub>2</sub> concentrations at the converter inlet and at the exit stack.

- Once every five minutes, the system will sample the latest SO<sub>2</sub> concentrations, add the recent readings to the array and delete the oldest readings. If the unit is not operating then the array of data will not change.

- M1<sub>3hravg</sub> will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO<sub>2</sub> entering the converter (M1<sub>3hravg</sub>).

- M2<sub>3hravg</sub> will then be calculated as the arithmetic average of the 36 most recent data samples for the fractional concentration of SO<sub>2</sub> at the stack (M2<sub>3hravg</sub>).

- The rolling 3 hour average SO<sub>2</sub> emissions (E<sub>3hravg</sub>) will then be calculated per Equation 2.

$$\begin{array}{l} \underline{Equation~2}~(rolling~3~hour~average~SO_2~emissions)\\ Xe_{3hravg}=~(M1_{3hravg}-M2_{3hravg})/(M1_{3hravg}-1.5~x~M1_{3hravg}~x~M2_{3hravg})\\ E_{3hravg}=~(K~/~Xe_{3hravg})-K \end{array}$$

- The production unit will be deemed to be operating in compliance with the Short Term Limit if E<sub>3hr-avg</sub> does not exceed 3.0 lb of SO<sub>2</sub> per ton of 100% sulfuric acid produced during all Operating Hours except periods of Startup, Shutdown or Malfunction.

During routine calibration checks and adjustments of the SO<sub>2</sub> monitors, the SO<sub>2</sub> measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs.

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### Long-Term Limit

The following method will be used to calculate the daily average lb of SO<sub>2</sub> per ton of 100% sulfuric acid, and the number of Operating Hours for the calendar day.

- Once every five minutes during all Operating Hours, the SO<sub>2</sub> concentrations (converter inlet and exit stack) will be sampled and this time will be counted as five operating minutes. If the unit is not operating, then the SO<sub>2</sub> concentrations will not be sampled.
- The daily average will be calculated as follows for each calendar day:
  - M1<sub>daily avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of SO<sub>2</sub> entering the converter.
  - M2<sub>daily avg</sub> will be calculated as the arithmetic average of the sample population for the fractional concentration of SO<sub>2</sub> at the stack
  - o E<sub>(daily avg)</sub> will then be calculated using Equation 3.

- o The number of operating minutes for the day will be summed  $(T_{day},)$
- E<sub>dayavg</sub> and T<sub>day</sub> will be used to calculate a 365-day rolling average of lb/ton. The
  daily averages will be weighted by the number of operating minutes per day, as
  per Equation 4.

Once the system has been in operation for 365 days, compliance with the Long Term Limit (365-day rolling average) SO<sub>2</sub> emission rate will be calculated using Equation 4.

# Equation 4

$$E_{365avg} = \frac{\sum [E_{dayavg} * T_{day}]}{\sum T_{day}}$$

The production unit will be deemed to be operating in compliance with the Long-Term Limit if  $E_{365avg}$  does not exceed 1.8 lb of  $SO_2$  per ton of 100% sulfuric acid produced during all Operating Hours

During routine calibration checks and adjustments of the SO<sub>2</sub> monitors, the SO<sub>2</sub> measurement will be "frozen" at its pre-calibration level. Refer to System Maintenance and Malfunction for guidance during CEMS malfunctions, breakdowns, and repairs:

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# Pt. 60.84 Emissions Monitoring Pt. 60, App. B, Spec. 2, Section 6.0 (Stack and Converter Inlet Analyzers)

Rhodia proposes to use the following stack analyzer specifications to satisfy the requirements of Pt. 60.84 and Pt. 60, App. B, Spec. 2, Section 6.0. The stack analyzer span must be capable of accommodating elevated emissions during startup. Specifications for the analyzer located at the converter inlet are based on Rhodia's experience with process analyzers at these locations.

An equivalent analyzer may be substituted for any reason.

Location	Manufacturer	Model Number	Range
Stack	Ametek Photometric Analyzer (or equivalent)	920 (or equivalent)	Dual range:  Normal: $0-500$ ppm SO <sub>2</sub> SSM: $0-3,600$ ppm  SO <sub>2</sub>
Converter Inlet	Ametek Photometric Analyzer (or equivalent)	920 or IPS-4 (or equivalent)	Single range: 0 – 15 % SO <sub>2</sub>

# Pt. 60, App. B, Spec. 2, Section 1.0 (Stack and Converter Inlet Analyzers)

Initial compliance certification required only if the analyzer is replaced or if system modifications require one to be performed. Additional detail and exceptions noted below under System Modifications below.

### Pt. 60, App. B, Spec. 2, Section 8.0 (Converter Inlet Analyzer)

Rhodia will select the optimum location to obtain representative SO<sub>2</sub> readings from this location. Turbulence near the blower exit and elevated temperature at the converter inlet may require an analyzer measurement location that differs from the requirements of this section (e.g. pollutant stratification). A pollutant stratification test is not warranted for this application because (a) process conditions make it extremely unlikely that stratification could occur, and (b) the samples obtained under this monitoring plan are the same as would be obtained under the NSPS, except that the instrument will typically take 288 samples per day rather than the 3 required by the NSPS. Therefore, no new stratification risk is introduced by this method, but the instrument will typically take about 100 times as many samples.

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# Pt. 60, App. B, Spec. 2, Section 16.0 (Converter Inlet Analyzer)

Rhodia will use the Alternative Relative Accuracy Procedure provided in Section 16.2.1 (i.e. conduct a cylinder gas audit).

# Pt. 60, App. F, Spec. 2, Section 5.0 (Converter Inlet Analyzer)

Rhodia will use quarterly cylinder gas audits (i.e. four per year) to satisfy the requirements of this section.

# System Maintenance and Malfunction

Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the plant shall conduct monitoring in continuous operation during all Operating Hours as defined above

In the event of a CEMS malfunction of greater than 24 hours:

- Exit stack gas will be sampled and analyzed at least once per hour, during all Operating
  Hours. Sampling will be conducted by Reich test or other method (e.g. portable
  analyzer).
- Converter inlet gas will either be sampled, or estimated using engineering judgment, at least once every four hours during all Operating Hours.
- Compliance with the Short-Term Limit and Long-Term Limit shall be verified by using these data and Equations 2, 3, and 4 with the following exceptions. If the stack CEMS is out of service, the most recent hourly reading will be substituted for the 12 five-minute readings that would otherwise be taken if the system was operating normally. Similarly, if the converter inlet SO<sub>2</sub> analyzer is out of service, the most recent four-hour reading will be substituted for the 48 five-minute readings that would otherwise be taken if the system was operating normally.

In the event of an analyzer malfunction, a like-kind replacement may be used while repairs are being made. A cylinder gas audit (CGA) must be performed on the replacement analyzer as soon as is practicable after it is placed in service. The daily calibration drift requirement would also apply to the replacement analyzer.

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### **System Modifications**

Significant replacement, modification, or change in certified CEMS equipment may require a complete recertification. If a recertification is required, it will be conducted within 90 days. Examples include:

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- Change in location or orientation of the sampling probe or site
- Complete replacement of an existing continuous emission monitoring system.

When replacing components that can alter the physical characteristics or conditioning of the sample in the field, a CGA is required. The following activities will require a CGA to be performed before returning the analyzer to service.

- Replacement of the analyzer
- Detector replacement
- Replacement of equipment associated with the detector

The following activities are not expected to trigger a CGA. However, it is recommended that a Calibration Drift check be performed before returning to service.

- Filter replacement
- Data Recorder Repairs
- Tubing replacement

General guidance: When replacing components or devices that do not affect the physical characteristics or handling of the gas in the field such as data recorders, a CGA is not required. A calibration drift check normally should be conducted. If the repaired component affects the transport of the gas to the analyzer, such as replacing tubing, a leak check should be conducted.

### **Alternative Monitoring System**

The monitoring system proposed in this Alternative Monitoring Plan is expected to be a significant improvement over the monitoring requirements contained in the NSPS for sulfuric acid plants. However, the real-time calculation of SO<sub>2</sub> emissions is dependent upon the use of an SO<sub>2</sub> analyzer in the inlet duct to the converter, and the maintenance of that analyzer to approximately the same performance standards normally applied to the stack SO<sub>2</sub> CEMS. This is an unproven application of this technology, and there is some risk that the converter inlet SO<sub>2</sub> analyzer will not be able to perform as required despite the best efforts of Rhodia and the instrument manufacturer.

If Rhodia and the instrument manufacturer are unable to make the system operate to the indicated standards because the converter inlet SO<sub>2</sub> analyzer is unreliable and / or inaccurate in this application, then Rhodia will promptly notify EPA Region 6, and TCEQ of its determination and proceed as follows:

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- Rhodia will immediately begin meeting its SO<sub>2</sub> emissions monitoring requirements in accordance with 40 CFR Part 60, Subpart H, except that the SO<sub>2</sub> concentration at the converter inlet will be analyzed six times per day rather than the three times per day specified in the regulations.
- Rhodia will provide whatever information is requested by EPA regarding the determination that the converter inlet SO<sub>2</sub> analyzer can not meet the necessary performance standards.
- Rhodia will work with EPA to determine whether real time measurement of SO<sub>2</sub> emissions (in lbs / ton of acid) can be readily accomplished through other means without the use of an SO<sub>2</sub> analyzer at the converter inlet.

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Dated February 10, 2012

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### Permit Number 4802/PSDTX1260

Acetaldehyde Acetic Acid Acetic Anyhdride

Acetone

Acetone Cyanohydrin

Acetophenone

2-acetylaminofluorene Acetyl Chloride Acetylsalicylic acid Neo Acid Anhydrides

Acrolein\*

Alicarb

Acrylamide (solid)
Acrylonitrile\*
Acrylic Acid
Adipic acid
Adiponitrile
Aldrin

Aliphatic Carboxylic Acid Aliphatic Hydrocarbons Alkenyl Caroxylate Allyl Alcohol

Alpha Methylstyrene Alpha Naphtylamine Alpha Naphthylthiourea 2-(2-Aminoethoxy)Ethanol

4-aminophenol

Aminoethyl Ethanolamine

tris(hydroxymethyl)aminomethane

Amitrole (solid) Ammonia

Ammonium Hydroxide Ammonium Nitrate\* Ammonium Polysulfide Ammonium Procrate, dry t-Amyl Hydroperoxide

Aniline\*
Anthracene\*
Anthroquinone
Antimony\*

Aromatic Naphtha

Arsenic\*
Arsine\*

Ash Atrazine\* Auramine Azeo Oil

Barium\*

Barium Sulfate Bendocarb

Benz(a)anthracene Benz(a)pyrene\* Benz(c)acrindine Benzaldehyde

Benzamide,3,5-dichloro-N-(1,1-dimethyl-2-propynyl)

Benzyl mercaptan

Benzene\*

Benzene, 1,1-(2,2-dichloroethylidene) bis

[4-chloro-] Benzenediamine

Benzeneethanamine, alpha, alpha-dimethyl-

Benzene Hexchloride Benzene Sulfonyl Chloride

Benzidine (solid) Benzonitrile

Benzo (RST) pentaphene

Benzo (a) pyrene

Benzo (a) phenanthrene Benzotriazobenzotrialzole

Benzoic Acid p-Benzoquinone\*

2-(2-hydroxy-3,5 di-(tert)amylphenol)

benzotirazoloe Benzotrichloride Benzoyl Chloride Benzyl Chloride\*

Beryllium Biodiesel Biphenyl\* Bipyridyl

Bis(2-chloroethoxy)methane Bishexamethylenediamine Bis(methylthio)methane

Boron

Bromoacetone, liquid

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Page 2

Bromoform (tribromomethane)

Bromomethane (methyl bromide)

Brucine (solid)

Butadiene polymer

Butadiene tar

n-Butyl Acetate

Butyraldehyde\*

Butyl Ether

n-Butyl Formate

n-Butyl Propionate

1,3 Butadiene

n-Butane

1.4 Butanediol

Butanol

2-Butanol

n-butanol

t-butanol

1-Butene

cis-3 Butene

2-methyl-1-butene

n-butyl acetate

**Butyl Acrylate** 

sec-butyl alcohol

Butylcellosolve

t-Butyl Hydroperoxide\*

n-Butylmercaptan

1,3-Butylene Glycol

2-butyne-1,4-diol (BYD)

1.4-butynediol

Butyric Acid\*

2-methyl butyric acid

C-4

Cacodylic Acid

Camphechlor

Carbaryl (solid)

Carbon Bisulfide

Carbon Disulfide\*

Carbon Tetrachloride

Castor Oil

Catechol

Chloral, anhydrous, inhibited

Chlordane

Chlorinated Polyisobutylene

Chloroacetaldehyde

Chloroaniline-p

Chlorobenzene

1,2,4,5-tetrachlorobenzene

Chlorobenzilate

1-Chlorobutane

2-chloroethyl vinyl ether

Chloroform

Bis (2-chloro-1-methylethyl) ether

Chloromethane

(Chloromethyl) ether, bis

Chlormethyl methyl ether

Chloronaphazine

2-chloronaphthalene

o-Chlorophenol

2,6-dichlorophenol

Chromium\*

Chrysene\*

Coal tar

Creosote

Cresol

m-cresol

4-chloro-m-cresol

p-cresol

Crotonaldehyde

Cumene Hydroperoxide

di-tert-butyl-para-Cresol

Cumene

Cumene Hydroperoxide

p-Cumyl Phenol

Cyanogen Bromide

Cyanogen Chloride with less than 0.9% water

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Cyanogen Gas

1,3,6-tricyanohexane

Cyclohexane

Cyclohexanone

Cyclooctadiene

Cyclophosphamide

Copper\*

Creosote\*

Crotonaldehyde\*

Cyclohexyl Amine\*

Cyclopentadiene

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Page 3

Daunomycin

**DDT** 

Diacetone Alcohol

Dialkyl Disulfide Oil

Dibenz (A,H) anthreacene

Dibromomethane

Dibromomethane-1,2

Dibutylphthalate

Dicamba

o-Dichlorobenzene

m-Dichlorobenzene

p-Dichlorobenzene (solid)

Dichlorobenzidine-3,3 (solid)

Dichlorobutene

Dichloro-1,4, butene-2

1,2-Dichloroethane

trans-1,2-dichloroethene

Dichloroethyl ether

Dichlorodiflouromethane

Dichloromethane

Dichlorophenol-2,4

2,4 Dichlorophenoxy Acetic Acid

Dichloropropylene-1,3

Dicyanoethylamine

Dicyclopentadiene

Dieldrin

Diepoxybutane

Diethanolamine

Diethylaminoacetone

Diethyl Sulfide

Diesel Fuel

Di(2-ethylhexyl)phthalate

Diethylarsine

Diethyl Ether

Diethyl Ketone

Diethyl Phthalate

Diethylstilbestrol

Diethylene Glycol

Diethylene Glycol Dimethyl Ether

Diethylene Glycol Monomethyl Ether

Diethylenetriamine

Diglyme

2,3 dihydrofuran

Dihydrosafrole

Diisobutylene

Dimethoate

Dimethoxybenzidine-3,3

Dimethylamine

p-dimethylaminoazobenzene

Dimethylaminoethoxyethanol

Dimethylbenz(a)-anthracene-7,12

Dimethylbenzene

Dimethylbenzidine-3,3

(1,3-dimethylbutyl)-N-phenyl

Dimethylcarbamyl Chloride

Dimethyl Disulfide

Dimethylethanolamine\*

Dimethylformamide

Dimethylhydrazine, unsymmetrical

Dimethylmethylaminoethoxy ethaneamine

Dimethylphenol -2,4

(1,4-dimethylphentyl)-N-phenyl

Dimethyl Phthalate

Dimethyl Siloxane

Dimethyl Sulfate

Dimethyl Sulfide

Dimethyl Sulfoxide

Dimethyl Disulfide\*

Dimethyl Formamide (DMF)

1,2 Dimethyoxybenzene

Dimethoxyethane

Dimethyl Ether

Dimethylaminopropylamine DMAPA

Dimorphoxy Amino Glycol

4,6 Dinitro-o-cresol\*

Dinitrocyclohexylphenol

Dinitrotoluene-2,4

Di-n-octyl Phthalate

Dinoseb

Di-N-Propylamine

Dioxane

Diphenyl Hydrazine-1,2

Dipropylamine

Dipropylene Glycol Methyl Ether

Disulfoton

Di-t-butyl Peroxide

Dithiobiunet

Dithiobiuret

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Page 4

Diruon Dodecane

Dodecybenzene

Dodecybenzene alkylates Dodecyl Mercaptan\* tert-dodecylmercaptan

Endosulfan

Endrin

Epichlorohydrin\* Epinephrine 1,2 ethanedithiol

Ethane, 1, 1, 1, 2-tetrachloro Ethanimidothioic acid, N-

[(methylamino)carbonyl[oxy]-methy ester]

n-nitrosodiethanolamine

Ethoxy Ethanol Fluorthene Ethoxy Triglycol Ethyl Acetate Ethyl acrylate

n-nitrosodiethylamine Ethylbenzene

Ethyl Carbamate

Ethyl Lactate

Ethyl Mercaptan Ethyl Methacrylate

Ethyl Methanesulfonate

Ethyl Methyl Ketone Glycidaldehyde Ethyl Parathion (solid) Glycol Acetate Ethyl trimethyoxysilane

Ethylene

Ethylene Bromide

Ethylene Dichloride

Ethylene Imine, inhibited

Ethylene Oxide\*

Ethylene Thiourea (solid) Ethylidene Dichloride

2-Ethylhexaldehyde

Ethyl Lactate

Ethylene Almine, inhibited

Ethylene Diamine Ethylene Glycol

Ethylene Oxide

2 Ethyl-1-Hexanol

2-Ethylhexanoic Acid

Ethyl mercaptan\*

Ethylidene norbornene

Ethyl Propyl Acrolein

Ethylsuccinonitrile

Etoposide

Facet 75 DF Herbicide

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British John Diving Name

arevane sab<mark>abb</mark>

Famphur Fatty Acids Fludioxonil Flumaric Acid

Fluoroacetamide Fluoranthene

Ethanol Fluorosulfonic Acid Fluorotrichloromethane

> Formaldehyde\* Formic Acid No. 2 Fuel Oil

Furan Furfural\*

All Asia and the Gasoline

ronfilisel. A mekceelija

Gasoline Jet Fuel Glutaric acid

2-methylglutaronitrile

Glycol Diacetate

Grease Guaiacol

Guanidine, N-methyl-N'-nitro-N-nitroso-

HBM (2-hydroxisobutyric acid methyl ester)

. But i de la supre de la companie d

Heptachlor (solid)

Heptane Heptanol

3-Heptanone

Hexachlorobenzene

Hexachloro-1.3-butadiene\*

Hexachloroethane

Hexachlorocyclopentadiene

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Page 5

Hexachlorophene

Hexachloroprene (solid)

Hexane

1,6 hexamethylene diisocyanate\* Hexamethylene-1,6-diisocyanate

Hexene

Hydraulic Oil\* Hydrazine

Hydrazine, 1,2-diethyl-1,2-dimethylhydrazine Hydrazine Hydrate

Hydrochloric Acid, liquid Hydrocyanic Acid, liquefied

Hydrogen Chloride\* Hydrogen Cyanide Hydrogen Silesquioxane

Hydrogen Sulfide Hydroquinone

Hydroquinone Methyl Ether

2-hydroxyisobutyric acid methyl ether

(HBM)

Hydroxylamine

Indene\*

Indeno (1,2,3-CD) Pyrene

Iron Sulfate Isobutanol Isobutyl Acetate Isobutyraldehyde Isodecyl Alcohol

Isooctane Isodrin Isopar E Isopar L Isopentane Isoprene Isopropanol Isopropyl Acetate Isopropyl Formate Isopropyl Mercaptan

Isosafrole Isozaflutole

Kerosene

Ketone Keto/enol

Lasiocarpine Lead Acetate Lindane\* Lube Oils

Magnesium Chloride

Malathion

Maleic Anhydride\*

Malononitile Manganese\* Mefenoxam Melphalan Mercury

Methacrylonitrile Methanethiol\* Methapyrilene

Methomyl Intermediate (MHTA)

Methoxychlor (solid)

Methoxydihydropyran, liquid

n-(2-Methoxy-;-Methylethyl)-2,4-dimethyl-

2-amino-1-methoxypropane

n-methylacetamide

Methyl-3-13-(2H-benzotrizole-2-YL)-5-(tert)-

butyl-4 hydroxy phenyl) propionate

Methyl Chloride

Methyl Chlorocarbonate Methyl Chloroform Methyl Cyclohexane

Methyl Ethyl Ketone Peroxide

Methyl Glutanoitrile 2-Methylglutanronitrile 1-Methyoxy-2 Propanol 2-Methyoxy-1 Propanol

Methyl Acetate Methyl Acrylate\* Methyl Alcohol

3-methylchlolanthrene Methyl Chlorocarbonate Methylcholanthrene-3 n,n-bis-methylethyl Methyl Ethyl Ketone

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Page 6

Methyl Ethyl Morpholine

Methyl Formate

3-methylhexane

Methyl Hydrazine

Methyl Iodide

Methyl Isobutyl Ketone

Methyl Isocyanate

1-Methyl-2-Pyrrolidinone NMP

Methyl Mercaptan

Methylmercaptopropionaldehyde

Methyl Methacrylate

n-methyl morpholine

Methylnapthalene\*

Methyl Parathion

4-methyl-2-pentanone

2-(3,5-bis(methylphenylethyl)-2

hydroxyphenyl

Methyl Propyl Ketone

n-methyl pyrillidone

Methyl Tert-Butyl Ether

tetramethylthiuram disulfide

n-nitroso-n-methylurethane

Methylal

Methylthiouracil

Methylcyclohexanol

Methylene-bis-orthochloroaniline

Methylene Chloride

Methylpyridine-2

Methyl vinyl bis

(N-methylacetamindes)

Mitomycin c

Molybdenum

Monochloroethylene Monoethanolamine\*

Monoisopropylamine

Monomethyl ether hydroquinone

Monopropylene Glycol

Morpholine

Muscimol

Naphtha

Naphthalene

1.4-naphthoquinone

Napthylamine-beta (solid)

Nitric Acid

Nitric Oxide

Nickel\*

Nitroaniline-p (solid)

Nitrobenzene\*

Nitrodium-n-butylamine-N

Nitroglycerin (glyceryl)

Nitropropene-2

Nitrophenol\*

Nitrophenol-4 (solid)

2,4-dinitrophenol

2-nitropropane

Nitrosopipindine-n

Nitrosuliethylamine-n

Nitro-o-toluidine-5

Nitroso-N-ethylurea-N

Nitroso-N-methylurea-N

N-nitrosodi-N-propylamine

Shirted Stablish

Section 15 (1)

m-Nitrotoluene

2,6-dinitrotoluene

Nonanal

Nonene

tert-nonyl mercaptan

Novalar resins

Octane

Octanol

n-Octyl Mercaptan\*

Orthovanillin

Paraldehyde

Pelargonic Acid\*

Pentachlorobenzene

Pentachloroethane

n-pentane

Pentanol

n-Pentanoic Acid\*

Pentenenitrile

3-pentenenitrile

Perchloroethylene

Petroleum Distillates

Petroleum Distillates, Hydraulic Fluid

Petroleum Oil

Phenacetin

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Page 7

Phenanthrene\*

Phenol

2,4 bis(alpha, alpha-dimethyl benzyl)

phenol)

Phenothiazine

4-bromophenyl phenyl ether

Phenyl mercaptan

Phosgene\*
Phosphine\*

Phosphorus Pentasulfide

Phthalic anhydride

Pinene-alpha Pinene-beta Piperylene

Poast herbicide Polyester Glycol Polyethylbenzene

Polyethylene

Polyethylene glycol dimethyl ether

Polyisobutyleneamine Polyoxyalkyleneamine

Polypropylene\* Polystyrene

Potassium Acetate
Potassium Carbonate

Process Oil Promamide Propane

2-amino-1,3-propanediol

2-amino-2-ethyl-1,3-propanediol 2-amino-2-methyl-1,3-propanediol

Propane Sultone

Propanil Propanol

2-amino-2-methyl-propanol

Propargyl Alcohol\* Propionaldehyde\* Propionic Acid Propionitrile

Propionitrile, 3-chloro

Propyl Acetate Propylamine Propyl Heptenal

n-nitrosodi-n-propylamine

Propylene

Propylene Dichloride Propylene Glycol\*

Propylene Glycol Acetate Propylene Glycol Methyl Ether Propylene Glycol Monoethyl Ether

Propylene Glycol Monoethyl Ether Acetate

Propyleneimine, inhibited n-Propylmercaptan\*

Propxur Pyridine\*

Pyridine, 4-aminon-nitrosopyrrolidine n-vinyl-2-pyrrolidinone

Quaternarium Salts
Ouintozene (solid)

Reactive Sulfides

Red Oil Reserpine Resorcinol Rhodium\*

Safrole Sassafras Oil Selenium\* Soap

Sodium Hydroxide\*
Sodium Hypochlorite
Sodium Methoxide
Sodium Methylmeraptide

Sodium Nitrate Sodium Sulfate\* Sodium Sulfide Sodium Thiosulfate\*

Sosafrole-1 Succinic acid Succionitrile Sulfolane Sulfur\* Styrene

Sulfate Turpentine

Sulfolane

# APPROVED CHEMICAL LIST FOR HAZARDOUS WASTE OPERATIONS Permit Number 4802/PSDTX1260

Page 8

### Sulfurized isobutylene

Taxol

Terbufos

Terphenyl

Tert Amyl Alcohol

Tert Butyl Alcohol

Di-tert nonyl polysulfide (TNPS)

Tertiary amine

Tetrachloroethane

Tetrachloroethylene

Tetraethylene Glycol

Tetrahydrofuran

Tetrahydrothiophene

Thiamethoxam

Thioacetamide (solid)

Thiofanox

1-acetyl-2-thiourea

Thiourea (2-chlorophenyl)-

TDI Polymers\*

Thiosemicarbazide (solid)

Titanium tetrachloride

Toluene

Toluene Diamine\*

o-toluenediamine

2,4-toluene diisocyanate

2,6-toluene diisocyanate

o-toluic acid

Toluidine

Toluidine hydrochloride-o

4-chloro-o-toluidine hydrochloride

Toxaphene\*

Triallyl Amine\*

Tributylamine

Tributyl phosphate

1,2,4-Trichlorobenzene

1,1,1-Trichloroethane

1,1,2-Trichloroethane

Trichloroethene

Trichloroethylene

Trichlorofluoromethane

Tridecane

Triethanolamine\*

Triethylamine\*

Triethylene Glycol

Trifluralin

Trimellitic Anhydride

Trimethylbenzene

Tripolyamine

Tri-n-propylamine\*

2,4,6-Trinitrophenol\*

Trypan blue

Undecane

Uracil Mustard

n-Valeraldehyde

4-keto-1-valeric acid

Vanillin

Vinyl Acetate

Vinyl Acetate Polymer

Vinyl Chloride

4-Vinyl cyclohexene-1\*

Vinyl Methyl Ether

Vinylidene

Vinylidene Chloride

Vinyltrimethoxysilane

Warfarin\*

p-Xylene

Xylene

Xylidine (p-dimethylaminoazobenzene)

\* These compounds are subject to the emission rate limits of the July 2004 dispersion modeling report.

Dated: February 10, 2012

# EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

### Permit Number 4802/PSDTX1260

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point	All Collabilities	Air Contaminant	Emission Rates		
No. (1)	Source Name (2)	Name (3)	lbs/hour	TPY (4)	
104	Regeneration Unit No. 2 Stack (8)	Cl <sub>2</sub> CO H <sub>2</sub> SO <sub>4</sub> (10)	5.70 0.84 6.06	25.00 0.18 22.67	
		HCl NO <sub>x</sub> PM PM <sub>10</sub> PM <sub>2.5</sub> SO <sub>2</sub> VOC	0.28 37.20 4.01 4.01 4.01 1250.00 0.01	1.23 162.90 12.47 12.47 12.47 5475.00 0.01	
104	Regeneration Unit No. 2 Stack (9)	Cl <sub>2</sub> CO H <sub>2</sub> SO <sub>4</sub> (10) HCl NO <sub>x</sub> PM PM <sub>10</sub> PM <sub>2.5</sub> SO <sub>2</sub> VOC	5.70 0.01 7.19 0.16 37.20 4.01 4.01 4.01 143.75 0.01	25.00 0.05 20.99 0.70 61.95 12.47 12.47 12.47 377.78 0.01	
120	Vapor Combustor Standby Operation for Backup	$CO$ $NO_x$ $PM_{10}$ $SO_2$ $VOC$	1.51 1.80 0.14 0.01 0.10	3.33 3.96 0.30 0.02 0.22	
120	Vapor Combustor (6) (Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months)	$Cl_2$ $CO$ $HCl$ $NO_x$ $PM_{10}$ $SO_2$ $VOC$	0.14 0.40 0.06 0.48 0.04 0.01 22.22	0.09 0.27 0.04 0.32 0.02 0.01 3.41	
128	Regenerator No. 2 Preheater (1,000 hours per rolling 12-months)	CO NO <sub>x</sub>	2.07 2.46	1.03 1.23	

Emission Sources – Maximum Allowable Emission Rates

	Emission Sources – Maximum	Allowable Emission	Kates		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates  Ibs/hour TPY (4)		
		PM <sub>10</sub> SO <sub>2</sub> VOC	0.19 0.02 0.14	0.10 0.01 0.07	
170	Vapor Combustor 2 Normal Operation	CO NO <sub>x</sub> SO <sub>2</sub> VOC	4.28 2.15 0.01 0.08	0.30 0.15 0.01 0.01	
170	Vapor Combustor 2 (6) (Furnace Startup, Shutdown, and Maintenance 1,314 hours per rolling 12-months)	Cl <sub>2</sub> CO HCl NO <sub>x</sub> SO <sub>2</sub> VOC	0.40 15.30 2.07 1.78 2.02 12.90	0.03 4.85 0.13 0.57 0.13 0.86	
170	Vapor Combustor 2 (6) (Storage Tanks 48, 49, 53 and 56 Planned Inspection Purge Control Option One)	CO NO <sub>x</sub> SO <sub>2</sub> VOC	10.81 1.26 0.02 0.05	1.48 0.17 0.01 0.01	
CATSCNR2	Catalyst Screening for Regeneration Unit No. 2 Converter (6)	$PM \\ PM_{10} \\ PM_{2.5}$	0.01 0.01 0.01	0.01 0.01 0.01	
MSS-HAZTK1	Hazardous Waste Tanks (F2, F3) and T554, Planned MSS Purge (6)	VOC	0.02	0.01	
MSS-HAZTK2	Hazardous Waste Tanks (B1, B2, H1 and H2) Planned MSS Purge (6)	VOC	0.01	0.01	
TKINSPMSS1	Tank 78 Planned Inspection Purge (6)	CO C <sub>2</sub> H <sub>4</sub> NO <sub>x</sub> SO <sub>2</sub> VOC (7)	3.04 0.01 1.12 0.08 0.05	0.75 0.01 0.35 0.09 0.06	
TKINSPMSS2	Tanks 48, 49, 53 and 56 Planned Inspection Purge (6)	CO C <sub>2</sub> H <sub>4</sub> NO <sub>x</sub> SO <sub>2</sub> VOC (7)	3.04 0.01 1.12 0.08 0.05	0.40 0.01 0.19 0.01 0.01	
FE2	Process Fugitives (5)	SO <sub>2</sub>	0.05	0.20	
FE3	Process Fugitives (5)	SO <sub>2</sub>	0.01	0.03	
FE-12	Fugitives from HW Equipment (5)	VOC	0.04	0.19	

Emission Sources – Maximum Allowable Emission Rates

Emission Point		Air Contaminant	Emission Rates		
No. (1)	Source Name (2)	Name (3)	lbs/hour	TPY (4)	
FE-13	Fugitives from HW Equipment (5)	VOC	0.02	0.10	
FE-14	Fugitives from HW Equipment (5)	VOC	0.01	0.01	
FUG-SA1	Spent Acid Process Fugitives (5)	H <sub>2</sub> SO <sub>4</sub> SO <sub>2</sub> VOC	0.41 0.12 0.09	1.79 0.37 0.35	
FUG-SA2	Spent Acid Process Fugitives (5)	H <sub>2</sub> SO <sub>4</sub> SO <sub>2</sub> VOC	0.07 0.03 0.02	0.31 0.08 0.07	
FUG-SA3	Spent Acid Process Fugitives (5)	H <sub>2</sub> SO <sub>4</sub> SO <sub>2</sub> VOC	0.03 0.06 0.03	0.11 0.18 0.08	
FUG-SA4	Spent Acid Process Fugitives (5)	H <sub>2</sub> SO <sub>4</sub> SO <sub>2</sub> VOC	0.30 0.13 0.08	1.34 0.38 0.30	

- (1) Emission point identification either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3)  $C_2H_4$  ethylene
  - CO carbon monoxide
  - Cl<sub>2</sub> chlorine
  - $H_2SO_4$  sulfuric acid
  - HCl hydrogen chloride
  - $NO_x$  total oxides of nitrogen
  - PM particulate matter greater than 10 microns in diameter
  - $PM_{10}$  particulate matter (PM) equal to or less than 10 microns in diameter.
  - PM<sub>2.5</sub> particulate matter equal to or less than 2.5 microns in diameter
  - SO<sub>2</sub> sulfur dioxide
  - VOC volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Planned startup, shutdown, and maintenance emissions
- (7) Ethylene emissions are not included in the VOC emission total.
- (8) Pre emission control
- (9) Post emission control effective on and after April 1, 2014
- (10) PSDTX1260 pollutant

### Emission Sources – Maximum Allowable Emission Rates

Emission	rates are based on and	the facilities a	re limited by	the following maxis	num operating	sched	ule.
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Hrs/day _	24 Days/week <u>7</u>	_ Weeks/year	<u>52</u>			Ī.,*	
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Date: February 10, 2012

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### **CHAPTER 2**

### STACK SAMPLING FACILITIES

### **GENERAL**

Most sampling for representative results requires minimum sampling facilities for which the TCEQ has established the guidelines presented in this chapter. Stack sampling operations utilize a system of equipment to traverse a cross-section of the stack or duct through ports located such that a representative sample can be obtained. Normally, a monorail structure is erected so the cross-section of the stack may be traversed on two axes for circular stacks and on a matrix layout for rectangular or other shaped stacks.

These guidelines cannot anticipate all situations, and special cases will occur. Non-standard or alternate installations are therefore evaluated on an individual basis, and in such instances detailed plans should be sent to the local TCEQ Regional Office sufficiently in advance for review and approval before the construction of stack sampling facilities is initiated.

Various rules and regulations require that "safe and easy access" be provided for sampling. Facilities deemed insufficient by a TCEQ observer whether due to unsafe, crowded, or other conditions may preclude the observation of the sample and, in turn, the acceptance of the results.

The following guidelines constitute minimum requirements for safe and accessible stack sampling facilities. No attempt has been made to incorporate official safety rules, but all such applicable regulations must be followed.

### PHYSICAL FEATURES

Before consideration is given to the installation of sampling ports and platforms, certain dimensions and other features of the stack and stack gas must be verified in order that a representative sample is possible.

- Stack diameter must be at least four inches.
- Stack gas velocity head must be at least 0.05 inches of water.
- The stack must have at least 2-1/2 diameters of uniform undisturbed cross-section.

### **SAMPLING PORTS**

### Port Location

The optimum location of sampling ports is at least eight stack diameters downstream of any bends, inlets, constrictions, abatement equipment, straightening vanes, or other flow disturbance; and at least two stack diameters upstream of the stack exit or other flow disturbance. Hydraulic diameter is used for non-circular stacks and is defined later in this chapter. This location permits a sample traverse to be taken using a minimum of twelve sampling points. A greater number of sampling points is necessary on stacks which fail to meet this location criteria. For a valid sample traverse to be obtained, however, sampling ports must be located at least two stack diameters downstream and at least one-half stack diameter upstream from any disturbance. If a

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2-1/2 diameter length of uniform undisturbed stack cross-section is not available, stack modification must be made or an alternate sampling location must be chosen which will satisfy this criteria.

To minimize the increase in the number of sampling points required on stacks with undisturbed cross-section less than 10 but greater than 2-1/2 stack diameters in length, the sampling ports should be located such that the distance from the ports to the nearest upstream disturbance is four times the distance from the ports to the nearest downstream disturbance (see Figure 2-1 for minimum number of sampling points required). The 2-1/2 diameter criteria must be met; while the 4:1 distance ratio is a recommendation. of the first of the second of the first of the

### Port Size

Ports are minimum three-inch ID standard industrial flanged pipe with six-inch bolt circle diameter and closed by a removable blind flange. Larger port sizes are necessary on large diameter, double-walled stacks which necessitate longer ports, and six-inch ports are necessary for proportional PM-10 sampling. These ports should also be standard industrial flanged pipe. Ports no smaller than four inches inside diameter must be provided on stacks greater than ten feet in diameter. TO STATE STATES THE PARTY OF THE PARTY.

# na kanada ka Port Installation

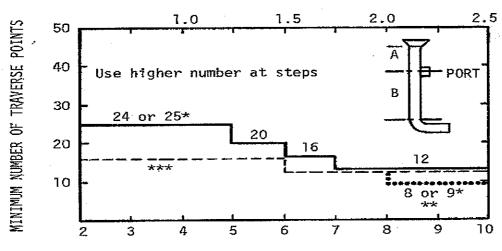
Ports shall be installed flush with the interior stack wall and shall extend outward from the exterior stack wall no less than three inches nor more than eight inches unless additional length is required for gate valves. Gate valves should be installed only when extreme stack conditions and/or the presence of hazardous materials require such devices for the safety of personnel. Ports should be installed no less than five feet nor more than six feet above the floor of the platform and the clearance zone described later in this chapter must be maintained.

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Section 1

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NUMBER OF DUCT DIAMETERS UPSTREAM FROM PORT (DISTANCE B)

\*Higher number is for rectangular stacks or ducts.

\*\*Dotted line is for stack diameter of one through
two feet (particulate and velocity traverses).

\*\*\*Dashed line is for velocity traverses only (gaseous sampling).

Figure 2-1
. Minimum Number or Traverse Points

### Number and Location of Ports on Circular Stacks

A minimum of two ports shall be installed on diameters 90° apart if the stack diameter plus one port length (stack inside wall to end of port extension) is less than ten feet. Four ports shall be installed on diameters 90° apart if the stack diameter plus one port length is equal to or greater than ten feet. One traverse should be located in the plane of any bend or other disturbance that may have inertial effects on particles in the flow stream.

### Number and Location of Ports on Non-Circular Stacks

The same upstream and downstream distance requirements discussed previously apply to non-circular stacks. The hydraulic diameter (four times the area divided by the perimeter) is used in place of the circular diameter. This becomes (2AB)/(A+B) for a rectangular stack, where A and B are the cross-sectional dimensions of the stack. The streamwise location of the sampling ports is determined in the same manner as for circular stacks using the hydraulic diameter. The hydraulic diameter is used only for determining the location of sampling ports and the required number of sampling points. Hydraulic diameter is not used in data reduction.

The cross-stream location of the sampling ports is dependent upon the total number of sampling

points required. Figure 2-1 is used to determine the required minimum number of sampling points by reading the curve corresponding to the number of upstream hydraulic diameters (B) and downstream hydraulic diameters (A) and selecting the higher number.

The stack cross-section of square or rectangular stacks is divided into a matrix (i, j) of equal area rectangles such that i = j or  $i = j \pm 1$  and i + j is equal to or greater than the total number of sampling points required. The number of sampling ports required is either i or j located along one side of the stack such that the centerline of each port is colinear with the centroid of each row of sampling points.

Stacks with cross-sections which are not circular or rectangular must be equipped with an adequate arrangement of sampling ports so that the stack cross-section may be divided into a sufficient number of area increments for a representative sample. If equal area increments are not possible, time weighting of the sample at the various sampling points may be necessary. Detailed plans of such installations should receive advance approval by the TCEQ.

### MONORAIL SUPPORT STRUCTURE

The installation of a permanent monorail support structure is recommended to reduce set-up time and to eliminate the load-bearing requirements for the sampling ports. Figure 2-2 shows a drawing of the monorail support structure including the relative position of the bracket to the sampling port. This bracket is intended to be compatible with several types of sampling equipment. The loading requirements for ports or the monorail support structure are shown below.

Port or Monorail Support Loading

The port or monorail support installation shall be capable of supporting the following loads:

- Vertical load of 200 pounds
- Horizontal load of 200 pounds
- Radial load of 1000 pounds (along stack diameter)

### WORK PLATFORM

A work platform shall be provided around the stack circumference between the sampling ports and extending at least three feet beyond each port. If four ports are required, the work platform shall extend around the entire circumference of the stack. The minimum platform width shall be at least three feet measured radially with stack diameter. The work platform must be capable of supporting at least 2000 pounds.

Safe and easy access to the work platform shall be provided via ladder, stairway, or other suitable means. Safe guardrails shall be provided around the platform. No open ladder well, stairwell, or other such opening shall be located within three feet of any sampling port. Ladder wells shall be covered at the platform and any opening to the platform shall be equipped with a safety bar or chain at the opening.

A temporary work platform for sampling operations is acceptable if proper safety and accessibility is provided. All other requirements detailed in this chapter such as for monorails,

ports, loading, clearance, and power must be met by the temporary facilities.

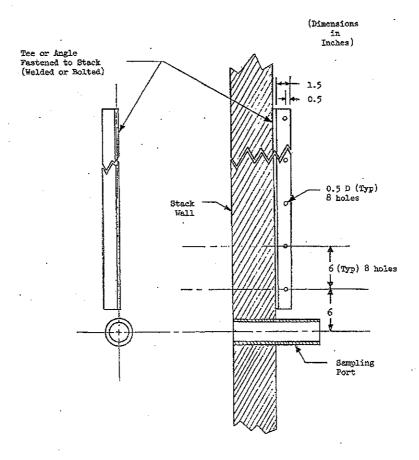


Figure 2-2 Monorail Support

### **CLEARANCE ZONE**

A three-dimensional obstruction-free clearance zone shall be provided around each sampling port. The zone shall extend one foot above the port, two feet below the port, and two feet to either side of the port. The zone shall extend outward from the exterior wall of the stack at least one stack diameter (or stack radius if four ports are provided), plus one port length (inside wall to end of port extension) plus three feet. Although this clearance zone is generally adequate for most sampling efforts, sampling contractors may have other clearance needs. A general clearance zone is illustrated in Figure 2-3.

### **POWER SUPPLY**

Power requirements may vary from site to site and the complexity and frequency of testing requirements. For complex test efforts the test firm and source owner/operator should verify adequate power is available. For normal test efforts electrical power outlets shall be provided as follows:

Platform Power

COMPANY OF THE REAL PROPERTY.

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At least one 115-volt, 15-amp, single phase, 60 hertz alternating current circuit with a grounded two-receptacle weather-proof outlet. Receptacles shall accept standard three-prong grounded household-type plugs or suitable adapters shall be provided.

Stack Base Power

Two 115-volt, 15-amp, single phase 60 hertz alternating current circuits with grounded two-receptacle weather-proof outlets. Receptacles shall accept standard three-prong grounded household-type plugs or suitable adapters shall be provided.

### VEHICLE ACCESS AND PARKING

Vehicle access and parking space should be provided near the base of the stack for various communications and equipment transport lines to be strung to the stack platform.

### GASEOUS SAMPLING - CONCENTRATION ONLY

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Standard sampling ports and platforms are normally necessary for gaseous sampling because a velocity traverse is needed for flow rate determination in most cases. In sampling situations for which only pollutant concentration is needed or for which an accurate flow rate is available by other approved means, less elaborate sampling facilities may be acceptable. All facilities must, however, meet strength and safety requirements.

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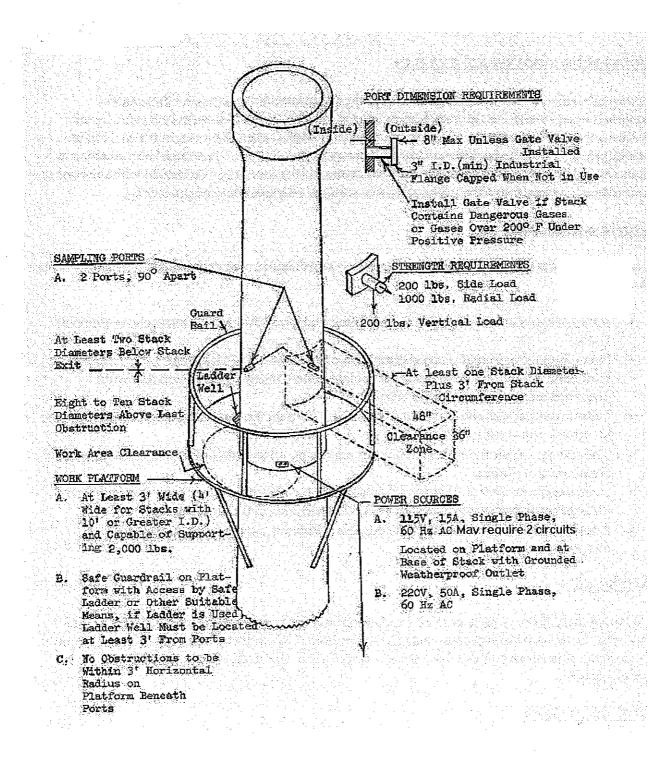


Figure 2-3 Stack Facilities

Gaseous sampling facilities for concentration only shall be sufficient for collection of a sample of stack gas according to standard gaseous sampling procedures. Adequate minimum facilities such as a one inch nipple shall be installed in the stack at a location where sufficient turbulence exists (no stratification) to insure a representative sample. Proper clearance must be provided for sampling operations or a permanent probe and sample line can be installed at the port location and extended to a more accessible sampling location. The probe and sample line must be installed so that leak checks can be made.

### PERMANENT MONORAIL SYSTEMS

Source operators are encouraged to install permanent monorail systems on large stacks. Monorails must extend the full radial length of the clearance zone described previously, and must be capable of supporting a 200 pound load anywhere along the monorail track. Rollers must be properly lubricated and maintained in working condition. The sample box attachment hooks should be six inches above the port centerline. If the monorail is installed with the hooks more than six inches above the port centerline, suitable adapters must be provided.

## Miscellaneous Requirements

In addition to the specific requirements detailed in this chapter, other miscellaneous requirements are as follows:

- Power hoists shall be provided for sampling platforms 200 feet or more above ground level.
- Non-circular horizontal ducts should have provisions for vertical sampling. Circular
  horizontal ducts should have one vertical and one horizontal port. Suitable work
  platforms are necessary in both cases.
- Heat insulation shall be installed as necessary on high temperature stacks for safety in the vicinity of the work platform.
- The source operator is responsible for maintaining all sampling facilities in safe, useable condition at all times.
- As mentioned earlier, one traverse should be located in the plane of any bend or other disturbance that may have inertial effects on particles in the flow stream.
- Stacks may taper by as much as 15 degrees without the taper being considered a disturbance.

### EXCESS AIR

Additional facilities may be necessary for determining the composition and flow rates of feed stock and fuel on certain processes such as incinerators. This information, obtained at the time of sampling, is necessary to calculate the amount of air in the stack effluent in excess of stoichiometric.

#### CYCLONIC FLOW

Cyclonic or swirling flow may be encountered in a stack or duct due to certain circumstances such as cyclone collectors or tangential duct entry. Corrective measures such as straightening vanes may be necessary to alleviate the cyclonic condition.

The existence of cyclonic flow may be determined as described in Chapter 5. A method for sampling cyclonic flow is described in Appendix H, but advance approval should be obtained concerning its applicability for determining compliance status.

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### **CHAPTER 14**

### CONTENTS OF AIR EMISSION TEST REPORTS

### **GENERAL**

This chapter outlines the requirements for the contents of air emission test reports. Special sampling situations may arise that do not fit these categories; however, this chapter has been broadly designed to serve as a guide to the standardization and quality assurance practices that must be included for a report to be considered complete. These items will be checked upon review. The four most common deficiencies of test reports are: insufficient documentation of process conditions, insufficient documentation of test activities, inadequate calibration of test equipment, and the lack of approval for alternate methods or method deviations. It is required that all testing activities incorporate good laboratory practices. Also the procedures used for testing and reporting of results shall be those which are commonly accepted in the field of air pollution control per 30 TAC Chapter 101.14. All emission related data generated at the site must be submitted, once the TCEO has been notified a compliance test is scheduled. Omission of pertinent information will be grounds for rejection of a report, which could subject the facility to non-compliance and possible enforcement action. In addition, the Texas Clean Air Act, Criminal Offenses, §382.091(a)(2), addresses intentionally or knowingly omitting material information, making false statements, concealing, and/or altering any notice, report or other document required by chapter, rule or permit.

Reports reviews are conducted by the TCEQ to determine acceptability of the report based on the following general criteria:

- a. Is the air emissions test report in an acceptable and logical format?
- b. Is the air emissions test report complete?
- c. Have the Source's Subpart/Permit/Standard Exemption testing requirements been fulfilled?
- d. How valid is the testing event's raw test data?
- e. Were correct equations and terms used in the report's calculations?

A TCEQ conducted report review is the ultimate basis upon which an Air Emissions Test Report is officially accepted or rejected by the Agency (TCEQ). The acceptability of a report is easier to determine if contents are complete and presented in a logical, organized manner, as illustrated in this chapter. Use of the TCEQ format for presentation of field data and calibration is encouraged to expedite report evaluation. At least two copies of each report shall be sent to the TCEQ, one copy to the appropriate TCEQ regional office, and the second copy to the Austin Office, Engineering Services Team. It is recommended that the following list be used as a checklist for the report to insure it is complete.

### STACK SAMPLING

Stack test reports <u>shall</u> contain the following minimum information:

Table of Contents: Or an equivalent means of locating sections of the report, including additional volumes or appendices which may be required.

Every page of the report will be numbered.

### Introduction:

Background information pertinent to the test and testing requirements (title page may be sufficient)

- Name and physical location of source sampled and date(s) of sampling.
- Identification of the process and name and number of the unit sampled using TCEQ Account Numbers, TCEQ Permit Numbers, and Emission Point Numbers
- List of applicable testing requirements with brief explanation:
  - TCEQ Regulation numbers; TCEQ Permit numbers;
  - TCEQ Permit exemption requests, U.S. Environmental Protection Agency (EPA) New Source Performance Standards (NSPS)/National Emissions Standards for Hazardous Air Pollutants (NESHAPS) Subparts; Hazardous Organic NESHAPS (HON)
  - other (i.e. NOV resolution, increased production rates, etc...).
- List of pollutants sampled.
- State whether this is the initial test, quarterly, or otherwise
- A detailed explanation of any tests which were not completed for any reason.

### Summary:

The portion of the air emissions test report that states the final results of the testing event and compares the results to the requirements, provisions and allowances of the applicable governing regulations and standards.

The Test Report summary shall compare all pollutant mass emission rates determined during the air emissions testing event with all applicable standards, including: NSPS, NESHAP, HON, TCEQ general and/or special provisions/conditions of the source's Permit, Permit Application Representations, Exemption Demonstration Requirements, etc.. Additionally, it should address any case where relevant air emissions testing has been conducted, or where special source conditions have brought about relevant test conditions, such as increased production rates.

The averages of each of the air pollutant concentrations required to be measured by the source's permit, or applicable Federal Subpart, or any other environmental regulatory agency with jurisdiction.

The averages of pertinent support data measured during the testing event, in time units which are appropriate for use in the determination of the mass emission rate(s) of the air pollutants required to be tested for, (by the source's operating permit or the applicable Federal Subpart).

 Particulate emissions rates including and excluding the impinger catch portion of the sample. The impinger portion of the sample may be excluded only in certain cases.

- Percent isokinetic for each isokinetic sample.
- Schedule of intermittent periods during sampling and the normal schedule of such events (i.e. Soot blowing, CEMS blowback, process downtime, batch process, etc.).
- Operating level of the process during each sample or sample run plus the normal (usual), design maximum and maximum achievable operating levels.
- Statement of operating condition of all abatement equipment during sampling including any cleaning cycles associated with the abatement equipment (i.e, absorber regeneration, baghouse bag cleaning cycles, ESP rapping, etc.).

Procedures:

Description of equipment and procedures used during sampling and analysis

- If equipment, procedures, and analysis methods were those described in the applicable sections of the TCEQ Sampling Procedures Manual, the Federal Register, and the Test Plan, a statement to that effect should be included along with a list of specific methods, procedures, and test equipment; schematic of instrumental analyzer sampling system, including all pumps, valves, mass flow controls, sample conditioning systems, heated lines, manifolds and atmospheric vents as configured during the test; any Reference Method deviation(s) approved by the TCEQ, including the date approved, and name & title of the TCEQ representative who approved the deviation(s).
- If any equipment, procedures, and analysis methods were consistent with TCEQ Sampling Procedures Manual, the Federal Register, and the Test Plan, provide <u>additional</u> information for those efforts including a detailed description of such methods, procedures, and equipment used; written approval for any deviations from standard procedures including: the name and description of all special apparatus and alternative testing methods used during test; copy of the method and publication references; written documentation of alternate test method approval.

Appendices:

The portions of the air emissions test report that include various categories of supplementary and support information which is included to enhance the validity of the practices and procedures conducted prior, during and subsequent to the air emissions testing event.

• Schematic drawing of stack (elevation and plan views) showing all dimensions, sampling port locations, inlets, outlets, and nearest upstream and downstream flow disturbances with sampling point

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locations shown on plan view. Pictures of emission points may be substituted for drawings however, measurements of the interior dimensions of the emission point are required.

Copies of all raw data taken during sampling. All handwritten data shall be recorded exclusively in indelible ink by all test and plant personnel, during the air emissions testing event. All data generated during the test by any instrumentation such as strip charts, integrator printouts, data acquisition system printouts shall be completely reproduced legibly, and included. The duration of all test runs, calibrations, and other significant events shall be clearly indicated

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Process Data: The averages of all process raw data recorded during the testing event, in time units which are appropriate for use in the determination of the mass emission rate(s) of the air pollutants required by the source's operating permit or the applicable Federal Subpart.

The averages of all process or production parameters recorded, calculated or determined during the air emissions testing event, in time units which are appropriate for use in the determination of the mass emission rate(s) of the air pollutants required by the source's operating permit or the and the second of the second applicable Federal Subpart. The second is a second

 One with a Maria and a more segment of the Mr. I design All other information necessary, at the discretion of the TCEQ, prior or subsequent to the test, so long as it does not place an unreasonable burden, financially or logistically upon the consultant or owner/operator.

> All measured pollutant emissions: both including & excluding the impinger catch portion of extracted samples.

The Air Emissions Test Report shall state the following process or production rates for the facility, or the production or process unit in which the emission source is in service:

- Logs of process parameters as may be necessary to document levels of operation. All printouts obtained from process, such as load etc., must be accompanied by a description which identifies the parameters and units used
- Designed Rate of the second of
  - Permitted Rate (if applicable)

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- Maximum Rate (if different from the designed rate)
- Production Rate(s) Demonstrated during the testing event(s)

• Production Rates(s) Demonstrated during the Immediately Previous air emissions testing event, if applicable. (recommended)

#### Calibrations:

Dated calibration records with dates and worksheets for all equipment used during sampling. The name and description of all primary air emissions testing equipment used during the air emissions testing event, including manufacturer, model number and serial numbers. If in question, the adequacy of the calibrations will be compared to the procedures in the current edition of the Quality Assurance Handbook for Air Pollution Measurement Systems

### Lab data:

Laboratory analysis worksheets and results including tare weights, blank results, spiked samples, audit samples and recovery studies required by the test method must be included. Additional information sufficient for an independent evaluation of the procedure may be required for complex methods such as daily calibrations, date and time analysis were conducted, audit materials, and laboratory certifications.

A record of the chain of custody of the samples from sampling collecting through the final sample analysis.

Visible emission determination, opacity data sheets, observer certification, etc. if conducted.

#### Calculations:

- Example calculations of all applicable stack gas parameters, emission rates, and analytical results for the test including:
  - Emission rates;
  - Allowable emission rates (TCEQ, EPA);
  - Excess air in stack;
  - Cyclonic flow;
  - Percent isokinetic;
  - F factor;
  - Soot blowing;
  - Stack gas parameters (velocity, moisture content, ACFM, SCFM)
  - Intermediate steps during analysis (titrations, aliquots, blanks)
  - An example calculation shall be performed using actual data from one of the valid test runs.

### Consultant:

- Personnel information
  - Name, address, and telephone number of company and name of company contact for additional information;
  - Name and affiliations of all personnel present during testing and their responsibilities during the test;
  - Name, address, and telephone number of testing organization;

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Also required as part of the report submittal is pretest meeting documentation, if a pretest meeting was held. A copy of the TCEQ permit, if any, which applied to the unit(s) at the time of the testing to document the language and emission limits at the time of the testing. Written approval for any major modification to a Reference Method. Written approval for any method(s) which was used that is not published in an EPA document, along with a copy of the method(s) detailing minimum and maximum detection limits, interferences, etc.

For testing required under the provisions of TCEQ flexible permits, reports should contain a calculation of emissions to compare to the cap on the day of testing for all emissions sources under the cap. The Hourly Cap Compliance Demonstration Summary Table (HCCDST) should be used to report the data.

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Eco Services Enterprise Houston Plant

## CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7011 2000 0001 4575 4553)

January 27, 2012

Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087

Austin, Texas 78711-3087

Subject:

Rhodia Inc. (CN600125330)

Houston Plant (RN100220581) Public Notice Verification Form Air Permit No.: 4802 and PSDTX1260

Account No.: HG-0697-O

Dear Sir or Madame:

Please find the Public Notice Verification Form for the Rhodia Houston plant's above mentioned air permit amendment application.

If you have any questions or require additional information, please contact me at 713-924-1408.

Sincerely,

W. F. Dickerson

Environmental Manager

attachments

cc:

U.S. Environmental Protection Agency Region 6 Attn: Air Permits Section (6PD-R) 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

TCEQ Air Section Manager Region 12 5425 Polk St. Suite H Houston, TX 77023-1452

TCEQ Office of Air Air Permits Division, MC-163 Mr. Stephen Anderson, P.E. P.O. Box 13087 Austin, TX 78711-3087

Mr. Bob Allen, Director, Environmental Public Health Division Harris County Public Health and Environmental Services 101 S Richey Street Suite G Pasadena, TX 77506

Mr. Arturo Blanco
Bureau Chief of Air Quality Control,
Health and Human Services Department,
City of Houston
7411 Park Place Blvd., Room 108
Houston, TX 77087-4441

Texas General Land Office Upland Leasing Team Leader Professional Services P.O. Box 12873 Austin, TX 78711-2873

> Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012



TCEQ 20244 - Air (Rev. 03/11)

# TEXAS COMMISSION ON ENVIRONMEN' AL QUALITY Public Notice Verification Form

## **Air Permit**

Applicant Name: Rhodia Inc.			
Site or Facility Name: Houston Plant		- 11.0	
TCEQ Account Number (if applicable): HG-0697-0	Permit Number: 4802/PSDTX	1260	
Regulated Entity Number: RN100220581	Customer Number: CN60012	5330	
The completed form must be sent to the TCEQ to the attention of <b>business days after the end of the designated comment policies</b> refer to the instructions in the public notice package.	of the Office of the Chief Clerk weriod. For more information re	vithin 10 egarding p	) oublic
ALTERNATIVE LANGUAG	E CHECKLIST		
I have contacted the appropriate school district.		ĭ¥Yes	□No
A bilingual education program is required by the Texas Education	n Code in the district.		□No
School District: Houston ISD	Phone Number:		
Person Contacted:	Date:		
The name of the elementary school nearest to the proposed or e	existing facility is: J. R. Harris		
The name of the middle school nearest to the proposed or existi		nool	
Students who attend one of the schools above are eligible to be program provided by the district.		XYes	□No
The following language(s) is/are utilized in the bilingual program	n: Spanish		
If an applicable bilingual program exists, then applicants outlined in the <i>Instructions for Public Notice</i> and certify a	must publish a notice and/ons applicable on this form.	or post s	igns, as
ALTERNATIVE LANGUAGE	VERIFICATION		
The area addressed by this permit application is subject to alter requirements.		⊠Yes	□No
The applicant has conducted a diligent search for a newspaper of circulation in both the municipality and county in which the facil be located).	or publication of general ity is located (or proposed to	XYes	☐ No
No such newspaper or publication was found in any of the alternatice is required.	native language(s) in which	☐ Yes	⊠ No
The publishers of the newspapers listed below refused to publish requested and no other newspaper or publication in the same la circulation was found in the municipality or county in which the proposed to be located).	nguage and of general	□No	⊠ N/A
Newspaper:	Language:		
Bilingual sign(s) required by the TCEQ were posted. (if application)	ole)	X Yes	□No
Original tear sheets of the newspaper alternative language notic affidavits have been sent to the $TCEQ$ .	ce(s) and the requested	∑Yes	□No
Verified by (signature): Ap	plicant: Rhodia Inc.		<u> </u>
Title: Environmental Manager Da	te: 1/27/2012		

Page 1 of 2



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Print Form

## Public Notice Verification Form Air Permit

Applicant Name: Rhodia Inc.			
Site or Facility Name: Houston Plant			
TCEQ Account Number (if applicable): HG-0697-0	Permit Number: 4802/PSDTX1260		
Regulated Entity Number: RN100220581	Customer Number: CN600125	330	
The completed form must be sent to the TCEQ to the attent business days after the end of the designated comme notice refer to the instructions in the public notice package.	nt period. For more information reg	rithin 10 garding	) public
NEW SOURCE REVIEW PERMI			
Required signs (for 1st notice) were posted in accordance ${\sf w}$ of the TCEQ.	ith the regulations and instructions	Yes	☐ No
Original tear sheets of the newspaper notices and the requent in accordance with the regulations and instructions of the T	ested affidavits have been furnished CEQ.	☐ Yes	☐ No
Notice of Receipt of Application and Intent to Obtain Per A copy of the complete air quality application, and any revision copying at the public place indicated below throughout the du	ons, were available for review and	☐ Yes	□ No
The public place indicated below provides public access to t	he internet.	☐ Yes	☐ No
Notice of Application and Preliminary Decision (2nd Notice of Application and Preliminary Decision (2nd Notice of the complete air quality application, executive directly includes the draft permit), the preliminary determination supplicable), and any revisions, are available for review and indicated below from the first day after newspaper publications.	ector's preliminary decision (which immary, and air quality analysis (if copying at the public place	X Yes	□No
A copy of the complete air quality application, executive dir includes the draft permit), the preliminary determination su applicable), and any revisions, will remain in the designated (1) the TCEQ acts on the application; or (2) the application is referred to the State Office of hearing.	ummary, and air quality analysis (if displayed public place until either:	X Yes	□ No
Name of Public Place: Houston Public Library - Melcher N	leighborhood Library	<u></u>	
Address of Public Place: 7200 Keller Street Houston, Texas	s 77012		
Verified by (signature): Whichers	Applicant: Rhodia Inc.		
Title: Environmental Manager	Date: 1/27/2012		
FEDERAL OPERATING PERMIT (TI	TLE V) NOTICE VERIFICATI	ON	
The required signs were posted in accordance with the regu	the state of the s		☐ No
Original tear sheets of the newspaper notices and the require accordance with the regulations and instruction of the TO	ested affidavits have been furnished		☐ No
A copy of the complete air quality application and draft per available for review and copying at the public place indicate the public comment period.	mit, and any revisions, were ed below throughout the duration of	Yes	∏ No
Name of Public Place:			45774.1
Address of Public Place:			
Verified by (signature):			
Title:	Date:		
TCEQ - 20244-Air (Revised 03/11)		Pa	age 2 of 2

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## PRELIMINARY DETERMINATION SUMMARY

Rhodia, Inc.
Permit Numbers 4802 and PSDTX1260

## I. APPLICANT

Rhodia, Inc. 8615 Manchester Street Houston, TX 77012-2142

## II. PROJECT LOCATION

The Rhodia site is located at 8615 Manchester Street, Houston, Harris County, Texas.

## III. PROJECT DESCRIPTION

Rhodia proposes changes to the sulfuric acid (H<sub>2</sub>S0<sub>4</sub>) daily production to 1150 tons per day by installing new and replacement equipment, add catalyst to the acid converter and install a new caustic scrubber to reduce sulfur dioxide (SO<sub>2</sub>) emissions downstream of the mist eliminator leading to an increase in H<sub>2</sub>S0<sub>4</sub> mist emissions from Emission Point No. (EPN) 104. The proposed project emission increase of H<sub>2</sub>S0<sub>4</sub> mist is greater than the seven tons per year (TPY) PSD major modification level for H<sub>2</sub>S0<sub>4</sub> mist at a named major stationary source. Netting was triggered and the net contemporaneous H<sub>2</sub>S0<sub>4</sub> mist emission increase is greater than seven TPY. This EPN receives H<sub>2</sub>S0<sub>4</sub> mist contained in the waste gas downstream of the existing H<sub>2</sub>S0<sub>4</sub> converters. No planned maintenance, startup and shutdown (MSS) activity and emissions will be authorized in this PSD permit for H<sub>2</sub>S0<sub>4</sub> mist.

### IV. EMISSIONS

The represented total potential to emit (PTE) emission from this site are 40 TPY of carbon monoxide, 94 TPY of H<sub>2</sub>SO<sub>4</sub> mist, 215 TPY of nitrogen oxides, 13 TPY of particulate matter less than ten microns, 6280 TPY of SO<sub>2</sub> and 10 TPY of volatile organic compounds. The H<sub>2</sub>SO<sub>4</sub> mist PTE is proposed to be 20.99 TPY from EPN 104. This represented H<sub>2</sub>SO<sub>4</sub> mist emission increase of 20.99 TPY for this project requires a PSD netting exercise. Rhodia performed a contemporaneous netting exercise and found the H<sub>2</sub>SO<sub>4</sub> mist contemporaneous increase is 10 TPY and this H<sub>2</sub>SO<sub>4</sub> mist emission increase is subject to PSD review. The project increase (potential to emit minus baseline actual emissions) of the other criteria pollutants emitted are summarized in the table below of Section V, Federal Applicability. The emission changes of other criteria pollutants associated with amendment are less than the respective PSD significance level of that pollutant.

Preliminary Determination Summary Permit Numbers 4802 and PSDTX1260 Page 2

## V. FEDERAL APPLICABILITY

Harris County is designated attainment for NO<sub>x</sub>, PM<sub>2.5</sub> and H<sub>2</sub>SO<sub>4</sub> mist. The project H<sub>2</sub>SO<sub>4</sub> mist PTE will be 20.99 TPY from EPN 104. For purposes of federal applicability review determination, the contemporaneous project increases (applicable to both new and existing facilities) were compared to the PSD H<sub>2</sub>SO<sub>4</sub> mist major modification limit of seven TPY at a named major stationary source. The represented contemporaneous H<sub>2</sub>SO<sub>4</sub> mist emission increase of 10.74 requires a PSD review after Rhodia completed the PSD contemporaneous netting exercise. The project PM<sub>2.5</sub> PTE will be 12.47 TPY from EPN 104. For purposes of federal applicability review determination, the contemporaneous project increases (applicable to both new and existing facilities) were compared to the PSD PM<sub>2.5</sub> major modification value of ten TPY at a named major stationary source. The netting demonstration showed a contemporaneous PM<sub>2.5</sub> emission increase of 5.97 TPY. PSD review does not apply to this PM<sub>2.5</sub> emission increase.

Harris County is designated severe ozone nonattainment. The project  $NO_x$  emission increase was evaluated as an ozone precursor. The actual to allowable  $NO_x$  emission comparison from EPN 104 found a project emission increase of 4.94 TPY which is below the five TPY netting trigger for ozone nonattainment review. The PSD  $NO_x$  netting threshold of forty TPY is not exceeded at a named major stationary source.

Pollutant	Project Increase	PSD Netting	Netting Required	Net Emission	Major Mod	PSD Triggered
	(tpy) <sup>1</sup>	Trigger (tpy)	Y/N	Change (tpy) <sup>2</sup>	Trigger (tpy)	Y/N
VOC <sup>5</sup>	0.0	40	N	•	40	N
NO <sub>x</sub> <sup>3</sup>	4.94	40	N	· <del>-</del>	40	N
$SO_2^3$	0.0	40	N ·	•	40	N.
СО	0.0	100	N	: <b>-</b>	100	N
PM <sub>10</sub>	12.47	15	N	. 19 3. <b>4</b> − 1	15	N
PM <sub>2.5</sub> <sup>4</sup>	12.47	10	Y	5.97	10	N
H <sub>2</sub> SO <sub>4</sub>	20.99	7	Y	10	7	Y

Project Increases: Comparison of Baseline Actual to PTE (or Projected Actual) Increases only

<sup>3</sup> PM<sub>2.5</sub> precursor. Not used to trigger PM<sub>2.5</sub> BACT or impacts analysis at this time.

<sup>5</sup> Harris County is designated severe ozone nonattainment and PSD review does not apply.

Net Emissions: Baseline Actual to PTE (or Projected Actual) for the project currently under review, Baseline Actual to PTE for all other increases & decreases within netting window.

Use  $PM_{10}$  emissions only if  $PM_{2.5}$  emissions cannot be quantified or estimated. ( $PM_{2.5}$  Implementation Plan).

## VI. CONTROL TECHNOLOGY REVIEW

A review of the US EPA RBLC for BACT of  $H_2S0_4$  mist emissions from new or modified  $H_2S0_4$  production units found it is 0.15 pounds  $H_2S0_4$  mist per ton of produced  $H_2S0_4$  on an hourly basis and 0.10 pounds  $H_2S0_4$  mist per ton of produced  $H_2S0_4$  on an annual basis.

The new caustic scrubber and other equipment will lead to increased H<sub>2</sub>S0<sub>4</sub> production which leads to increased H<sub>2</sub>S0<sub>4</sub> mist emissions from EPN 104. The technical review found installing a new mist eliminator is technically and economically viable as BACT for abating H<sub>2</sub>S0<sub>4</sub> mist emissions. BACT for H<sub>2</sub>S0<sub>4</sub> mist control is a mist eliminator controlling H<sub>2</sub>S0<sub>4</sub> to 0.15 pound per ton of produced H<sub>2</sub>S0<sub>4</sub> on an hourly basis. BACT for H<sub>2</sub>S0<sub>4</sub> mist control is 0.10 pound of H<sub>2</sub>S0<sub>4</sub> mist per ton of produced H<sub>2</sub>S0<sub>4</sub> on an annual basis. The company will continue to use the existing equipment configuration for H<sub>2</sub>S0<sub>4</sub> control. In addition, this technical review did not find evidence of any potential tail gas treatment that could be applied upstream and downstream of the new mist eliminator. The H<sub>2</sub>S0<sub>4</sub> mist control level achieved by the mist eliminator meets BACT.

Recordkeeping and stack sampling requirements are shown by special conditions in the permit for H<sub>2</sub>SO<sub>4</sub> mist emissions from EPN 104.

## VII. AIR QUALITY ANALYSIS

## A. DE MINIMIS ANALYSIS

No NAAQS deminimis exists for  $H_2S0_4$  mist and only the state  $H_2S0_4$  mist standards are applicable. The results are described in Section VII.C NAAQS Analysis

## B. AIR QUALITY MONITORING

H<sub>2</sub>S0<sub>4</sub> mist has no published ambient monitoring standard.

## C. NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS) ANALYSIS

No NAAQS significance levels are shown for  $H_2SO_4$  mist; therefore, a comparison with state of Texas standards is shown. The predicted twenty-four (24) hour impact for site wide  $H_2SO_4$  mist emissions are 13.5  $\Phi g/m^3$ , which is less than the 30 TAC Chapter 112 value of 15  $\Phi g/m^3$  for the 24 hour averaging time. The predicted worst case one hour impact for site wide  $H_2SO_4$  mist emissions are 43  $\Phi g/m^3$  which is less than the 30 TAC Chapter 112 limit of 50  $\Phi g/m^3$ . The results are summarized below in units of  $\Phi g/m^3$ :

Pollutant	Averaging Period	GLC,max (µg/m³)	Modeling Deminimis (μg/m³)	30 TAC 112 (μg/m³)
H <sub>2</sub> S0 <sub>4</sub> mist	1 - hr.	43	5	50
112504 IIIISt	24-hr	13.5	1	15

## D. INCREMENT ANALYSIS

H<sub>2</sub>S0<sub>4</sub> mist has no published PSD increment standard.

## E. ADDITIONAL IMPACTS ANALYSIS

The nearest Class I area, Caney Creek Wilderness Area is located greater than 475 kilometers from this existing site. This is an existing H<sub>2</sub>SO<sub>4</sub> production unit and no significant growth in the population or significant change in environmental impacts is expected. No adverse impacts on soils, vegetation or visibility are anticipated.

### F. AIR TOXICS REVIEW

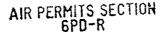
No new and no additional speciated VOC compounds will be authorized as emissions from EPN 104.

### VIII. CONCLUSION

The Texas Commission on Environmental Quality (TCEQ) analysis of the permit application indicates that this source will not endanger NAAQS and will meet BACT requirements. In addition, there will be no adverse effects on soils, vegetation or visibility. The distance to the nearest Class I area is sufficient to preclude any adverse impacts from this named major stationary source. Therefore, the TCEQ Executive Director proposes a preliminary determination of approval for Rhodia to increase annual  $H_2SO_4$  production by installing a new caustic scrubber to abate  $H_2SO_4$  mist at the existing production site located in Houston, Texas.

# RECEIVED

## 12 JAN 10 PM 4: 46





## CERTIFIED MAIL: Return Receipt Requested (7011 2000 0001 4575 4409)

January 4, 2012

Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, TX 78711-3087

Re:

Rhodia Inc. (CN600125330)

Houston Plant (RN100220581)

Air Permit No. 4802 and PSD-TX-1260

Account No.: HG-0697-O

### Dear Notice Team:

The Houston plant of Rhodia Inc. has completed the public notice publication requirements for the above-referenced permit, and original newspaper clippings, original affidavits, and alternative language affidavits for publication are enclosed. The public notice was published on December 26, 2011 in the Houston Chronicle and in La Voz de Houston.

If you have any questions on the amendment request, please do not hesitate to contact me at (713) 924-1484.

Sincerely,

W. F. Dickerson

Environmental Manager

Attachments

Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012 cc:

U.S. Environmental Protection Agency Region 6 Attn: Air Permits Section (6PD-R) 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

TCEQ Office of Air Air Permits Division, MC-163 Mr. Stephen Anderson, P.E. P. O. Box 13087 Austin, TX 78711-3087

TCEQ Region 12 Air Section Manager 5425 Polk St. Ste. H Houston, TX 77023-1452

Texas General Land Office Upland Leasing Team Leader Professional Services P.O. Box 12873 Austin, TX 78711-2873

Mr. Bob Allen
Director Pollution Control Department
Harris County Public Health and Environmental Services
101 S. Richey St. Ste. G
Pasadena, TX 77506

Mr. Arturo Blanco Bureau Chief of Air Quality Control, Health and Human Services Department, City of Houston 7411 Park Place Blvd. Houston, TX 77087-4441 TCBQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.
Permit No.: 4802 and PSDTX1260

## AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS	· §
COUNTY OF HARRIS	<u> </u>
Before me, the undersigned authority, on this c	lay personally appeared
	., who being by me duly sworn,
(name of newspaper representative)	•
deposes and says that (s)he is the	CLEPK newspaper representative)
of the 1400s ton CITRONICLE (name of newspaper)	; that said newspaper is generally circulated
in HOUSTON, HARRIS  (in the municipality or nearest municipality to	COUNTY , Texas; the location of the facility or the proposed facility)
that the attached notice was published in said	newspaper on the following date(s): 12-22-11
ADA 25170889 ACCT	4002695221
· · · · · · · · · · · · · · · · · · ·	elever Selia
	spaper representative's signature)
Subscribed and sworn to before me this the	36 day of DE-CE-MISE-R , 20 11 ,
to certify which witness my hand and seal of	Pluga ION
	Notary Public in and for the State of Texas
(Seal)	PENNI STON
PENNY STOW  NOTARY PUBLIC, STATE OF TEXAS  MY COMMISSION EXPIRES  FEB. 4, 2014	Print or Type Name of Notary Public
STOP TO THE PROPERTY OF THE PR	My Commission Expires

NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT AIR QUALITY PERMIT AIR QUALITY PERMIT NUMBERS: 4802 AND PSDTX1260

APPLICATION AND PRELIMINARY DECISION. Rhodia Inc., 8615 Manchester St., Houston, Texas 77012-2142, has applied to the Texas Commission on Environmental Quality (TCEQ) for amendment of Air Quality Permit 4802 and issuance of Prevention of Significant Deterioration (PSD) Air Quality Permit PSDTX1260, which would authorize construction of a caustic scrubber at the Regeneration Unit No. 2 at 8615 Manchester St., Houston, Harris County, Texas 77012. This application was submitted to the TCEQ on June 6, 2011. The existing facility will emit the following air contaminants in a significant amount suffuric acid mist. In addition, the facility will emit the following air contaminants. organic compounds, nitrogen oxides, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, suffur dioxide, carbon monoxide, suffuric acid, hydrogen chloride and chlorine.

The executive director has determined that the emissions of air contaminants from the proposed

chloride and chlorine.
The executive director has determined that the emissions of air contaminants from the proposed facility which are subject to PSD review will not violate any state or federal air quality regulations and will not have any significant adverse impact on soils, vegetation, or visibility. All air contaminants have been evaluated, and "best available control technology" will be used for the control of these contaminants.

The executive director has completed the technical

technology" Will be used for the control of these contaminants.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ central office, the TCEQ Houston regional office, and at the Melcher Neighborhood Library, 7200 Keller Street, Houston, Harris County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the TCEQ Houston, Regional Office, 5425 Polk St., Ste. N. HORMATION AVAILABLE ONLINE.

ICEQ Houston Regional Office, 5425 Polk 51., Ste. H, Houston, Texas.

INFORMATION AVAILABLE ONLINE. These documents are accessible through the Commission's Web site at www.tceq.texas.gov/goto/cid: the executive director's preliminary decision which includes the draft permit, the executive director's preliminary determination summary, the air quality analysis, and, once available, the executive director's response to comments and the final decision on this application. Access the Commissioners' Integrated Database (CID) using the above link and enter the permit number for his application. The public location mentioned above provides public access to the internet. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. http://prs.tceq.texas.gov/crintrut/index.cfm?fuseaction=detail.addnidDetail&addn\_id=5807911020021598.getail=no#.

PUBLIC COMMENT/PUBLIC MEETING. You

index.cfm?fuseaction=detail.addnIdDetail&addn\_idd=580791102002159&getail=no#.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting about this application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application, if requested by a local legislator. A public meeting is not a contested case hearing. You may submit additional written public comments within 30 days of the date of newspaper publication of this notice in the manner set forth in the AGENCY CONTACTS AND INFORMATION paragraph below.

After the deadline for public comment, the executive director will consider the comments and prepare a response to all public comment. The response to comments, along with the executive director will consider the comments and prepare a response to all public comments or is on a mailing list for this application.

OPPORTUNITY FOR A CONTESTED CASE HEADLUG A contested case hearing is a legal

to everyone who submitted public comments or is on a mailing list for this application.

OPPORTUNITY FOR A CONTESTED CASE HEARING. A contested case hearing is a legal proceeding similar to a civil trial in state district court. A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. A contested case hearing request must include the following: (1) your name (or for a group or association, an official representative), mailing address, dayfime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "I/we request a contested case hearing." (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility, and (6) a description of how you use the property which may be impacted by the application and distance of your property which may be impacted by the facility. If the request is made by a group or association, then one or more members who have standing to request a hearing and the interests the group or association seeks to profect must also be identified. You may also submit your proposed

standing to request a hearing and the interests the group or association seeks to protect must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns. Requests for a contested case hearing must be submitted in writing within 30 days following this notice to the Office of the Chief Clerk at the address provided in the information section below.

A contested case hearing will only be granted.

Clerk at the address provided in the information section below.

A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decisions on the application. Further, the Commission's decisions on the application. Further, the Commission will only grant a hearing on issues raised by you or others during the public comment period that have not been withdrawn. Issues that are not raised in public comments may not be considered during a hearing. EXECUTIVE DIRECTOR ACTION. If a timely contested case hearing request is not received or if all timely contested case hearing request is not received or if all timely contested case hearing requests are withdrawn, the executive director may issue final approval of the application. The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application, and will be posted electronically to the CID. If any timely hearing requests are received and not withdrawn, the executive director will not issue final approval of the permit and will forward the application and requests to the Commissioners for their consideration at a scheduled commission meeting.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION.

application by sending a request to the Office of the Chief Clerk at the address below.

AGENCY CONTACTS AND INFORMATION. Public comments and requests must be submitted either electronically at www.tceq.texas.gov/about/comments.html, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087, if you communicate with the TCEQ electronically, please be aware that your email address, like your physical mailing address, will become part of the agency's public record. For more information about this permit application or the permitting process, please call the Public Education Program toll free at 1-80-687-4040. Si desea informacion en Espanol puede llamar at 1-800-687-4040. Further information may also be obtained from Rhodia Inc at the address stated above or by calling Mr. Floyd Dickerson, Environmental Manager at (713) 924-1408.

Notice Issuance Date: December 5, 2011

Notice Issuance Date: December 5, 2011

TCEQ-Office of the Chief Clerk-MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.	_
Permit No.: 4802 and PSDTX1260	_

## AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS	· §
COUNTY OF HAIRIES	
Before me, the undersigned authority,	on this day personally appeared
EDWARD SILVA (name of newspaper representative	, who being by me duly sworn,
the series and serve that (a) he is the	IR CIERK
	(title of newspaper representative)
(name of newsnamer)	NICCE; that said newspaper is generally circulated
in HOUS toN, HBP (in the municipality or nearest municipality)	PIS COUNTY , Texas; pality to the location of the facility or the proposed facility)
	in said newspaper on the following date(s):
	acct # 002695221 12-22-11
40#25170891 A	Edward Selin
	(1000 - 1000)
•	(newspaper representative's signature)
Subscribed and sworn to before me th	is the <u>26</u> day of <u>DECEMBER</u> , 20 11,
to certify which witness my hand and	
	Notary Public in and for the State of Texas
(01)	Notary Public in and for the State of Toxas
(Seal)	PENNY STAW
	Print or Type Name of Notary Public
PENNY STATE OF THE PENNY STATE O	E OF TEXAS OF Commission Expires  114
STORY STREET,	rinners &

## TO ALL INTERESTED PERSONS AND PARTIES:

Rhodia Inc. has applied to the Texas Commission on Environmental Quality (TCEQ) for amendment of Air Quality Permit Number 4802 and issuance of Prevention of Significant Deterioration (PSD) Air Quality Permit PSDTX1260, which would authorize construction of a caustic scrubber at the Regeneration Unit No. 2 at 8615 Manchester St., Houston, Harris County, Texas 77012. Additional information concerning this application is contained in the public notice section of this newspaper.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.	
Permit No.: 4802 and PSDTX1260	

Austin, Texas 78711-3087
ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING
STATE OF TEXAS §
COUNTY OF HARRIS§
Before me, the undersigned authority, on this day personally appeared
EDWARD SILVA , who being by me duly sworn, deposes
(name of newspaper or publication representative)
and says that (s)he is the AIR CLERK  (title of newspaper or publication representative)
of the HOUSTON CHRONICLE DBH CH LOZ that said newspaper or publication is generally circulated (name of newspaper or publication)
in HOUSTON, HARRIS COUNTY, Texas;  (in the municipality or the same county as the location of the facility or the proposed facility)
that the attached notice was published in said newspaper or publication on the following date(s):  10#25170893 Acct #002695221 12-25-11
There & Selva
(newspaper or publication representative's signature)
Subscribed and sworn to before me this the 26 day of DECEMBER 20 11
to certify which witness my hand and seal of office.
Notary Public in and for the State of Texas
(Seal) Part Stav
Print or Type Name of Notary Public
PENNY STOW &
PENNY STOW PENNY STOW NOTARY PUBLIC, STATE OF TEXAS MY COMMISSION EXPIRES FEB. 4, 2014  THE TOTAL PROPERTY PUBLIC STATE OF TEXAS MY COMMISSION EXPIRES FEB. 4, 2014

1245 ANUNCIOS 1245 ANUNCIOS 1245 ANUNCIOS LEGALES

MOTIFICACION ENMENDADA DE APLICACION Y DECISION PRELIMINAR POR LA CALIDAD DE LAGUA TPDES PERMITIR ENMIENDA PARA LAS ACURA RESIDUALES INDUSTRIALES PERMISINA POR LA CALIDAD DE LAGUA TPDES PERMITIR ENMIENDA PARRA LAS ACURA RESIDUALES INDUSTRIALES PERMISION ON WORSHINGO MORPH PERMISION ON WORSHINGO MORPH PERMISIA PARA ENTRA MORPHA PERCENCE, L.P., 485 CIITITO DIFFUR BUILDING PERMISIA DE LA COMPISSA DE CORPE A MORPHA PERCENCE, L.P., 485 CIITITO DIFFUR PERMISIA DE COMPISSA DE MORPHA PERCENCE, L.P., 485 CIITITO DIFFURDA PERCENCE, L.P., 487 CIITITO DIFFURDA PERCENCE, L

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posteriormente.

DIRECTOR ELECUTIVO DE ACCION. El Director Elecutivo podra emitira arrobación definitiva de la solicitod, salvo una oportuna audiencia de caso solicitud o perificio de preconsideracion se presento. Si una oportuna audiencia de caso solicitudo a perificio de preconsideración se intersuso, el Director Elecutivo no siciliar prospection definitivo del permiso y remitirán la solicitud y de la solicitud del ETCEG Comisionados para su consideración en una reunion prevista de la Cerción.

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LISTA DE CORREO. SI somete comentarios publicos, un pedido para una audienda administrativa de lo contencioso o una reconsideración de la decision de lo decision de la decision de lo decision de la deci

ISTCEO.

Todos, so comentarios, escribos del publico, y. Jos pedidos para una requienta deben es representados a la Oficina de la Chief Clerk, MC 105, TCCO. Para de la Chief Clerk, MC 105, Chie

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publica no es una audiencia de caso irragunado. Usted pueste similer no estreta publica no es una audiencia de caso irragunado. Usted pueste similer no comentario publica no estreta de caso irragunado. Usted pueste similer no comentario publica no estreta de caso irragunado. Usted pueste similer no esta de caso irragunado. Usted pueste similer no esta de caso irragunado en informationa de caso irragunado en informationa de caso irragunado en care caso de caso irragunado en informationa de caso irragunado en care caso de caso irragunado en informationa publicos, el director de currentarios publicos, canada en caso en caso de caso indirector ejecutivo en esta solicitud sera envisada por carrea a todo suce de correos para esta solicitud. OPORTUNIDAD PARA UNA AUDIENCIA DE LO CONTENCIOSO. Una audiencia de lo comendarios os su proceso legal parectos e un tudos civil en el firibunal de distrito del estado. Una persona que puede star incenter contentarios atrabelemento en entre contentarios en entre contentarios atrabelemento en entre contentarios atrabelemento en entre contentarios en entre contentarios atrabelemento en entre contentarios atrabelemento en entre contentarios atrabelemento en entre contentarios en entre contentarios atrabelemento en entre contentarios atrabelemento en entre contentarios entre contentarios en entr

Se puede obtener información adicional de Rhodia Inc., a la dirección indicada arriba o llamando a Sr. Floyd Dickerson, Environmental Manager, al (713) 924-1408.

Fecha de Expedicion: <u>5 de diciembre de 2011</u>

AVISO DE RECIBO DE SOLICITUD E INTENCION DE OSTENER UN PERMISO DE MIRE

PERMISO NUMERO (7773) DE CALIDAD A TAMOS FERICA

SOLICITUD The bow Chemical Company, ha solicitude a la Comision de Calidad Arabienti la cross (TCC) per sus sujas en indes) poru una erumienda del Arabienti la cross (TCC) per sus sujas en indes) poru una erumienda del Arabienti la cross (TCC) per sus sujas en indes) poru una erumienda del Promisa Num, 7773 de Calidad Atmosferica, el cual auforitaria la modificacion al permiso de la planta de espuma de posiellinos scacada vibicada en SOJ independence Parkway South. La Porte, Condado de Harris, Texas 77371, Estia enica e un mapa electronico de la uticación peneral del Siño de la histalectoria proporcionado como una corrieraja y no esparte del solicitud o del aviso. Para la bulbación exota, consolle la solicitud.

Libro (NAMANICOS (CASS.SOS) (SASSE) (SASSE)

peza uma audiencia de lo contencioso deben presentaria por escritio dentro de la dial se despusa de este aviso, a la Oficina del Secretario Oficial ala dirección que se encuentra mas abaio. Se presistra a fermo uma petición para audiencia de lo contencioso, el director ejecutivo enviara la solicitud y custquier petición para uma audiencia de lo contencioso alos comisionados de la TCEQ para su consideracion durante uma de las reuniones programadas de la Comision. A menos que la spiciciudo se presente directimente a uma audiencia de lo contencioso, el director ejecutivo enviara la solicitud y custalento. El director que la spiciciudo se presente del contencioso, el director ejecutivo en uma audiencia de lo contencioso, el director ejecutivo del contencio de la comisiona del comisiona de la comisiona de la

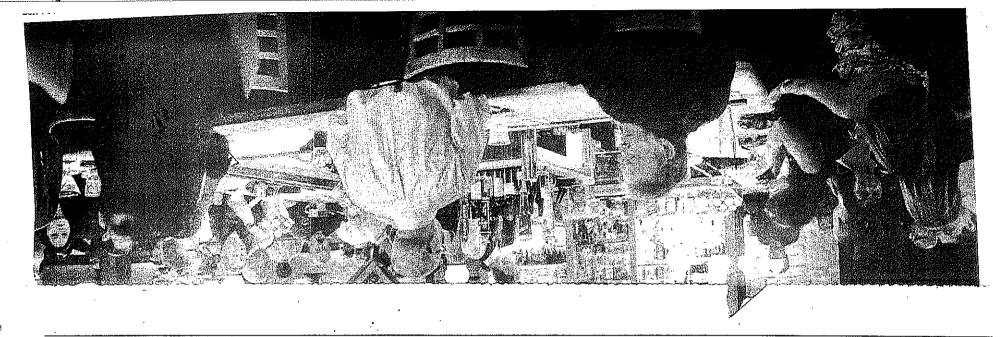
Fecha de Expedicion: 5 de diciembre de 2011.

AVISO DE RECIBO DE LA SOLICITUD Y EL INTENTO DE OBTENER PERMISO PARA LA CALIDAD DEL AGUA RENOVACION DE DIAGO MA PAYMONDIAGO

TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Applicant Name: Rhodia Inc.	
Permit No.: 4802 and PSDTX1260	_

Austin, lexas 16/11-3007	
ALTERNATIVE LANGUAGE AFF	DAVIT OF PUBLICATION FOR AIR PERMITTING
STATE OF TEXAS	§
COUNTY OF HERRIS	§
Before me, the undersigned authority, on this	day personally appeared
EDWARD SILVA (name of newspaper or publication represent	, who being by me duly sworn, deposes
4/2 (1	I-RK
	(sine of non-spaper of I
of the Houston CH POHICLE DBH LA (name of newspaper or publication	: LOZ; that said newspaper or publication is generally circulated
II In Ilmopic	COUN + , Texas;  as the location of the facility or the proposed facility)
that the attached notice was published in said	d newspaper or publication on the following date(s):
AD#25170895 Acct	#002693221
	(newspaper or publication representative's signature)
	(newspaper or publication representative & signature)
Subscribed and sworn to before me this the	26 day of DE-CEMBER 20 11
to certify which witness my hand and seal o	· · · · · · · · · · · · · · · · · · ·
•	Notary Public in and for the State of Texas
(Seai)	PENNY LOW
	Print or Type Name of Notary Public
	2/4/14
PENNY STOW NOTARY PUBLIC, STATE OF TEXAS MY COMMISSION EXPIRES FEB. 4, 2014	My Commission Expires



V 12 LA'VOZ DE HOUSTON

## ENTRETENIMIENTO

DOMINGO 25 DE DICIEMBRE DE 2011

TA TUDAS LAS PERSUNAS Y PARTES INTERESADAS:

Vopak Terminal Galena Park, Inc., ha solicitado a la Comision de Calidad Ambiental de Texas (TCEQ) una enmienda del Permiso Num. 2480A de Calidad del Aire, la cual autorizara una modificacion del Terminal de Almacenamiento de Liquidos a Granel ubicado en 1500 Clinton Dr., Galena Park, Condado de Harris, Texas 77547. En la seccion de avisos publicos de este periodico se encuentra informacion adicional sobre esta solicitud.

## A TODAS LAS PERSONASY PARTES INTERESADAS:

The Dow Chemical Company, ha solicitado a la Comision de Calidad Ambiental de Texas (TCEQ) una enmienda del Permiso Num. 77713 de Calidad del Aire, la cual autorizaria una modificacion para la planta de espuma de polietileno sacado ubicada en 550 Independence Parkway South, La Porte, Condado de Harris, Texas 77571. En la seccion de avisos publicos de este periodico se encuentra informacion adicional sobre esta solicitud.



A TODAS LAS PERSONAS Y PARTES INTERESADAS.

Rhodia Inc., ha solicitado a la Comisión de Calidad Ambiental de Texas (TCEQ) para enmendar el Permiso Num. 4802 de Calidad Atmosferica y la expedicion del Permiso Num. PSDTX1260 para Prevencion de Deterioro Significativo (PSD), que autorizara la construccion de un depurador caustico en la Planta de Regeneracion Num. 2 en 8615 Manchester Street, Houston, Condado de Harris, Texas 77012. Informacion adicional sobre esta solicitud se encuentra en la seccion de avisos publicos de este periodico.



CCB:mv

c: EPA Region VI

## **DEPARTMENT OF ENVIRONMENTAL QUALITY**

KATHLEEN BABINEAUX BLANCO GOVERNOR

MIKE D. McDANIEL, Ph.D. SECRETARY

A/AI/PE 1/0000450100

GENERAL PERMIT BRIEFING SHEET

Certified Mail No. 7005 1160 0005 2991 3104

Activity No. PER20060003 Agency Interest No. 1314

	<u>Oil</u>	and Gas Producti (Type of Facility)	<u>on</u>	
Agency Interest Nam Company Name: Rho Parish: East Baton Ro Physical Location: 1275 Airline Hwy. Baton Rouge, LA 7082	dia, Inc. uge			
Contact: Marcus Lewis Plant Manager P.O. Box 828 Baton Rouge, LA 7082	21-0828			
Type of Source:	Existing	X New	Modified	Renewal
Operation of this facil specific requirements midnight on the renewal application has this authorization shall action on the application umber should be referenced.	and the general 28th of s been submitted l remain in effection for authorization	conditions attached for the six months prior et until such time ion renewal. The	ed. This authorization 2011 unless a time to expiration. Terms as the permitting authorization and the permit number and the second control of the control o	on shall expire at ely and complete and conditions of thority takes final
Permit No.: 3032-V0  Chuck Carr Brown, Ph Assistant Secretary	a.D.	·		
Date	<del></del>			

Rhodia, Inc.
Agency Interest No.: 1314; PER20060003
Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

## Origin:

The original application and Emission Inventory Questionnaire (EIQ), dated April 20, 2006 requested an initial Part 70 Title V General Operating permit for a back-up boiler.

Rhodia Inc. (Rhodia) operates a Sulfuric Acid Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces sulfuric acid by using two sulfuric acid production trains (Unit No. 1 and Unit No. 2). Unit No. 1 was constructed in 1953 and unit No. 2 was constructed in 1968. State Operating Permit No. 2038 dated November 12, 1990 incorporated a Package Boiler. Previously the facility operated under Permit 0840-00033-02 dated June 12, 1995. Currently the facility operates under Permit 0840-00033-V0 dated October 12, 2005.

This is the Initial Part 70 Title V General operating permit for the Back-up Boiler facility.

	Emissions Summary										
	Hourly Maximum	Annual*									
Pollutant	lb/hr	TPY									
PM <sub>10</sub>	0.99	0.43									
$SO_2$	0.08	0.04									
$NO_x$	5.05	2.21									
CO	3.59	1.57									
VOC	0.72	0.32									

<sup>\*</sup> The emissions are based on 876 hrs/yr operating time.

## **Facility Process Description:**

Rhodia receives spent sulfuric acid and hazardous waste fuels from off-site sources and recovers the sulfur and energy values in its industrial furnaces, forming fresh sulfuric acid. The sulfuric acid production process begins with treatment of the feed streams in the industrial furnace. Liquids are sprayed using atomizers into the combustion chamber. Normal operating conditions are 2 to 4% excess furnace oxygen and furnace temperature between 1800°F and 2200°F at the furnace discharge. Furnace residence time is approximately three seconds. The feed streams are producing steam for process use. Gas from the waste heat boiler is further cooled and cleaned in the gas scrubbing system. This system includes spray scrubbing and wet electrostatic precipitators to remove acid mist and particulate emissions.

Cooling systems reduce the gas temperature from 600°F to 100°F. The wet gas is then dried through counter-current packed flow columns circulating ≥93% sulfuric acid. Dry gas is heated to 800°F before the sulfur dioxide is converted to sulfur trioxide using catalyst. Because the conversion step to sulfur trioxide is exothermic, the hot exhaust gas is used to heat up the incoming feed by cross-current heat exchange.

Rhodia, Inc.
Agency Interest No.: 1314; PER20060003
Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

## **Facility Process Description:**

Sulfur trioxide from the converter enters a countercurrent packed absorption tower. Strong sulfuric acid absorbs and hydrolyzes the sulfur trioxide to sulfuric acid. The demisters are the final pollution control device, removing primarily sulfuric acid mist generated in the acid tower. The demisters also capture any remaining HCl and particulate emissions.

The preceding process description pertains to Unit No. 1. The Unit No. 2 process is slightly different. After the drying step, the gas enters a second sulfur burning furnace, followed by a hot gas filter. This added step heats the gas, affording a second occasion for combustion. Unit No. 2 has over twice the capacity of Unit No. 1. Equipment is sized proportionately, with Unit No. 2 having a longer residence time.

Rhodia's Baton Rouge Facility consists of the Sulfuric Acid Plant (Permit 0840-00033-V0) and CathyVal Plant (Permit 2184-V0). Under normal operation, the Sulfuric Acid Plant provides all the steam needed to run the CathyVal Plant. Rhodia has a permitted package boiler that provides a backup supply of steam when one or both of the Sulfuric Acid Plant Units are down. However, this package boiler does not provide enough steam to keep the CathyVal Plant running at full rate when the Sulfuric Acid Unit No. 2 is down. Historically Rhodia has supplemented the package boiler by renting a second boiler (typically < 100 MMBtu/hr) on a case-by-case basis (via variance). It would be more economic to keep a back-up boiler (natural-gas fired) onsite long term. Rhodia needs the back-up boiler to be onsite beginning May 1, 2006 for a Unit No. 2 turnaround in the Sulfuric Acid Plant. The proposed boiler Rhodia intends to rent is rated at 133 MMBtu/hr. In addition Rhodia will limit the annual capacity factor per 40 CFR 60.44b(j) to 10% or less (at least for the first year).

This activity does not meets the criteria in LAC 33:III.501.B5.B32 for an insignificant activity because LAC 33:III.501. B5 states that if a federally applicable requirement (i.e. NSPS Db) applies, the activity is not insignificant and a permit is required.

The emissions of this permit do not exceed the permitted limitations of the existing boiler (Unit No. 2) in the Sulfuric Acid Plant.

Rhodia, Inc.

Agency Interest No.: 1314; PER20060003

Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

## Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

## **Insignificant Activities**

There are no insignificant activities at this site.

## **General Condition XVII Activities:**

There are no General Condition XVII activities at this site.

### **Ambient Air Impact**

Pollutant	Time Period	Calculated Maximum	Louisiana Toxic Air Pollutant
		Ground Level	Ambient Air Quality Standard or
		Concentration	(National Ambient Air Quality
			Standard {NAAQS})

## Type of Review

Rhodia's application was reviewed for compliance with 40 CFR Part 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and Compliance Assurance Monitoring (CAM). Prevention of Significant Deterioration (PSD) and National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations do not apply.

This facility is a major source of toxic air pollutants.

Rhodia, Inc.
Agency Interest No.: 1314; PER20060003
Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

## **Public Notice**

Request for public comment on this General Permit was published in The Louisiana Register, on October 20, 2004, The Advocate, Baton Rouge; The Times-Picayune, New Orleans; The News-Star, Monroe; The Lake Charles American Press, Lake Charles; The Times of Shreveport, Shreveport; The Advertiser, Lafayette; the Town Talk of Alexandria, Alexandria and in the Courier of Houma, Houma on October 14, 2004. Several non-technical comments were received and considered prior to approval.

## TABLE 1. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Rhodia, Inc.

Agency Interest No.: 1314; PER20060003

Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

										T 4.77	33:111	r			***************************************				
ID No.	Description	5▲	9	11	13	15	2103	2104*	2109	2111	2113	2115	2116*	2122	22	29*	51*	56	59
EQT 186	1-06 – Back-up Boiler			1	1	1						3							

\* The regulations indicated above are State Only regulations.

All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

## TABLE 1. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Rhodia, Inc.

Agency Interest No.: 1314; PER20060003 Back-up Boiler – Sulfuric Acid Plant Baton Rouge, East Baton Rouge Parish, Louisiana

		40 CFR 60									R 6	1				40 CFR Part						
ID No.	Description	A	D	Db	Dc	K	Ka	Kb	$\mathbf{G}\mathbf{G}$	VV	III	A	M	V	FF	A	F	G	Н	64	68	72
EQT 186	1-06 Back-up Boiler	1	3	1	3												3	3				

### KEY:

- 1. The regulations have applicable requirements, which apply to this particular emission source. The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2. The regulations have applicable requirements, which apply to this particular emission source, but the source is currently exempt from these requirements due to meeting specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3. The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

## TABLE 2. APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS EXPLANATION FOR EXEMPTION STATUS OF A SOURCE

Rhodia, Inc.

Agency Interest No.: 1314; PER20060003

Back-up Boiler – Sulfuric Acid Plant
Baton Rouge, East Baton Rouge Parish, Louisiana

ID No:	Requirement	Notes
EQT 186	Control Emission of Organic Compounds	DOES NOT APPLY - No waste gas streams enter the
1-06	LAC 33:III.2115	equipment.
Back-up Boiler		
	NSPS Subpart D – Standards of Performance for Fossil Fuel Fired Steam Generating Units 40 CFR 60.40(a)(1)	DOES NOT APPLY - Boiler is not utilized to generate power and it has a heat input capacity of < 250 MM Btu/hr.
	NSPS Subpart Da – Standards of Performance for Electric Utility Steam Generating Units 40 CFR 60.40a(a)(1)	DOES NOT APPLY – Boiler is not utilized to generate power and it has a heat input capacity of < 250 MM Btu/hr.
	NSPS Subpart Dc – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units 40 CFR 60.40c(a)	DOES NOT APPLY – Boiler has a heat input capacity of greater than 100 MM Btu/hr.
	NSPS Subpart J – Standards of Performance for Petroleum Refineries 40 CFR 60.100(b) and (e)	DOES NOT APPLY – Boiler is not located in a petroleum refinery.
	NESHAP for Source Categories Subparts F and G 40 CFR 63.101	DOES NOT APPLY – Source does not meet the definition of process vent.

The above table provides explanation for the non-applicability or exemption status of a source cited by 1, 2, or 3 in the matrix presented in Table 1 above of this permit.

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]

- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
  - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
  - 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
  - 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
  - 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original stripchart recordings for continuous monitoring instrumentation, and all reports required by the permit.

  [Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
  - 1. the date, place as defined in the permit, and time of sampling or measurements;
  - 2. the date(s) analyses were performed;
  - 3. the company or entity that performed the analyses;
  - 4. the analytical techniques or methods used;
  - 5. the results of such analyses; and
  - 6. the operating conditions as existing at the time of sampling or measurement. [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]

- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
  - 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  - 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;

- 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
- 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
- 5. changes in emissions would not qualify as a significant modification; and
- 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Surveillance Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
  - 1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
    - a. Report by June 30 to cover January through March
    - b. Report by September 30 to cover April through June
    - c. Report by December 31 to cover July through September
    - d. Report by March 31 to cover October through December
  - 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]

- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
  - 1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
  - 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
  - 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
  - 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
  - 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
  - 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly

## **40 CFR PART 70 GENERAL CONDITIONS**

average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated April 20, 2006.
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.

- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior

approval from the Office of Environmental Assessment, Air Quality Assessment Division.

- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
  - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
    - 1. Report by June 30 to cover January through March
    - 2. Report by September 30 to cover April through June
    - 3. Report by December 31 to cover July through September
    - 4. Report by March 31 to cover October through December
  - D. Each report submitted in accordance with this condition shall contain the following information:
    - 1. Description of noncomplying emission(s);
    - 2. Cause of noncompliance;
    - 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
    - 4. Steps taken by the permittee to reduce and eliminate the noncomplying

emissions; and

- 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
  - A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
  - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
  - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
  - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and Form 7030 r12

approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:

1. Generally be less than 5 TPY

2. Be less than the minimum emission rate (MER)

3. Be scheduled daily, weekly, monthly, etc., or

4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division La. Dept. of Environmental Quality Post Office Box 4302 Baton Rouge, Louisiana 70821-4302

XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

#### SPECIFIC REQUIREMENTS

AI ID: 1314 - Rhodia Inc Activity Number: PER20060003 Permit Number: 3032-V0 Air - Title V General Permit Initial

#### **EQT186**

#### 1-06 - Rental Boiler

- 1 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
- Which Months: All Year Statistical Basis: None specified
- 2 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
  Which Months: All Year Statistical Basis: Six-minute average
- 3 Sulfur dioxide: Discharge gases shall not exceed 2000 ppmv for 3 hr average. [LAC 33:III.1503.C]
- 4 Operating time <= 876 hr/yr. Non compliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if operating time exceeds the maximum listed in this specific condition for any twelve consecutive month period. [LAC 33:III.501.C.6]

  Which Months: All Year Statistical Basis: None specified
- 5 Operating time monitored by technically sound method as needed. [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
- 6 Operating time recordkeeping by electronic or hard copy monthly. Keep records of the rental boiler operating time for each month, as well as the operating time for the last twelve months. Make records available for inspection by DEQ personnel. [LAC 33:III.501.C.6]
- 7 Operating time Submit report: Due annually, by the 31st of March. Report the rental boiler operating time for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division. [LAC 33:III.501.C.6]
- 8 Operating time: Operating only when Unit No.2, permitted in the Sulfuric Acid Plant Permit 0840-00033-V0 is down. [LAC 33:III.501.C.6]
- 9 All affected (NSPS) stationary sources comply with applicable provisions of this subpart. [40 CFR 60.1 20]
- 10 Maintain emissions of particulate matter and sulfur dioxide to rates indicated in this subpart. Take federal enforceable condition to limit operating time to comply with nitrogen oxide emission limits as per 40 CFR 60.44b(k). Conduct performance test within 189 days to establish boiler maximum capacity. [40 CFR 60.40b(a)]
- Determine maximum heat input capacity of the steam generating unit at maximum capacity for 24 hours. Use the heat loss method described in sections 5 and 6.3 of the ASME Power Test Codes 4.1 (see IBR 40 CFR 60.17(h))). This demonstration of maximum heat input capacity shall be made during the initial performance test. It shall be made within 60 days after achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup of each facility. [40 CFR 60.44b(j)]
- 12 Report information specified in 40 CFR 60.49b(d); (o); (p); (q) and (w). Semi-annual reporting. [40 CFR 60.49b]
- 13 Conduct performance testing no later than 180 days after initial startup. [40 CFR 60.8(a)]
- 14 Submit notifications of data of start of construction, anticipated startup of the facility, and actual startup of the facility as required by 40 CFR 60.7. [40 CFR 60.Subpart A]

L100 V. 6?

# AIR, PESTICIDES, AND TOXICS 6TH FLOOR RECORDS CENTER INFILE / NEW FILE FORM

	New file:		or	Infiling:	х	·	
Choose from	n the file types below:						
<u>Ai</u>	r Facility		<u>TSCA</u>				
	AR- Acid Rain		AH - As	bestos Hazar	rd Emergency Res	sponse Act	
	CB- Confidential Busi	ness	AS or A	W - Asbestos	s or Asbestos Wo	rker Prot.	
	CO- Compliance		CB - Cor	nfidential			
	EN- ** Enforcement		SI - Site	Specific			
	GE- General		FO - Noi	n Site Specifi	С		, , , , , , , , , , , , , , , , , , ,
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	RA- Regulatory Applic	ability	LB - ** L	.ead		Proj No:	74
	Other:		PC - **P	СВ	40, <sup>7</sup>	LDEQ AI:	1314
**	Extension of File Type (i		•		Permit Type Minor Pmt No:	Numbe	r
		ES - Enforc	ement Sensitive		PSD Pmt No: TV Pmt No:	0840-00033-V4	
		DP - Docke	et Number		NNSR Pmt No:		
	EPCRA / SARA		FIFRA		CAIR Pmt No: AR Pmt No:		
	<b></b>						
FRS Number:	11 0000 450 100	C	ompany Name:	Rhodia Inc			
Site Name:	Baton Rouge Facility	A	rea Name:	Sulfuric Ac	id Plant		
Fac Street:	1275 Airline Hwy	F	ac City:	Baton Rou	ge		
Fac Cnty:	East Baton Rouge	F	ac State:	LA	Fac Zip:	70805	
	<u> </u>		Ma	iterials Sent	To File Room		
Requestor's I				plication:		Format: Pa	per .
Requestor's I	Phone: 214 - 665	-7258	Pei	rmit(s):	11/28/2012	•	



December 15, 2011

Mr. Sanford Phillips, Assistant Secretary (Hand Delivered, original + 2 copies) Louisiana Department of Environmental Quality Office of Environmental Services; Air Permits Division P.O. Box 4313 Baton Rouge, LA 70821-4313

EPA Region 6 (6PD-R) 1445 Ross Avenue, Ste. 1200 Dallas, TX 75202-2733

Subject:

Application for Minor Permit Modification to Part 70 Permit

Sulfuric Acid Plant; Title V Permit No. 0840-0033-V3 Rhodia, Inc., Baton Rouge, LA; Agency Interest No. 1314

Dear Mr. Phillips:

On May 11, 2011, LDEQ issued a Title V Permit Renewal to Rhodia for the Sulfuric Acid Plant. Rhodia is requesting that minor permit modification procedures be used to reconcile emission rates and make other minor corrections/updates. The requested changes do not modify, remove, or add any federally-enforceable applicable requirements nor have any new federally-enforceable requirements become applicable since the last permit modification/renewal. A draft permit is not included (per LAC 33:III.525.B.2.c) because the requested changes are minor and the overall permit will remain largely unchanged.

LAC 33:III.525.B.2.b requires certification by responsible official that the proposed modification meets the criteria listed in LAC 33:III.525.A for a minor modification. Per LAC 33:III.525.A.2.f, a proposed modification is not a minor modification if it seeks to establish or exceed an enforceable emissions cap assumed to establish minor source status or to avoid classification as a Title I modification. The proposed "modification" (emissions reconciliation only) includes a 0.26 tpy increase in the HAP emissions cap; the site remains an area source of HAPs. Per conversation on 12-15-11 with LDEQ personnel, since the site remains an area source of HAPs, the permit modification can be handled as a minor modification but will be sent to 30-day public notice. By signature below, I certify that the proposed modification meets the other criteria in LAC 33:III.525.A.2 for a minor modification.

If you have any questions or require any further information, please call John Richardson at 359-3768 or Julie Sheffield at 359-3432.

Sincerely,

Daniel Tate Plant Manager

and A To

File 402.1.2

DEC 27 PM 5: 3
R PERMITS SECTION

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

# **LOUISIANA**

## Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

Culturia Asid Dlant				All Pro	cess Units	
Sulfuric Acid Plant		•		Proces	s Unit-Spe	cific Permit
Agency Interest Number (A.I. Number)	<del></del>	•	Currently Effecti	ve Permit Nur	aber(s)	
1314				0840-0003	3-V3	
Company - Name of Owner						
Rhodia, Inc.						
Company - Name of Operator (if different from	Owner)					
N/A						
Parent Company (if Company – Name of Owner	given abo	ove is a divisi	on)			
The Solvay Group						
Ownership:						
Check the appropriate box.	_	rogulated utility	, –	municipal gava	mmont	
corporation, partnership, or sole proprietorship	L	regulated utility	_	municipal gove	mient	
state government		federal govern	ment $\square$	other, specify		
What modifications/changes are proposed in this ap	plication	? Add more ro	ows as necessary.			
see next	page					
Nearest town (in the same parish as the facility):		Paris	h(es) where facility	y is located:		
Baton Rouge			East Baton Roug	e		
Distance To (mi): ~222 Texas		269 Arkan	sas ~129	Mississippi	~262	_ Alabama
Latitude Front Gate: 30 Deg		30 Min	30	_Sec	30	_Hundredths
Longitude Front Gate: -91 Deg Distance from nearest Class I Area 225	Kilon	11 Min	16	Sec	58	Hundredths
	<del></del>		.7 6 171 7			·
Add physical address and description of location of more rows as necessary.	j the jacii	ity below. If i	the facility has no c	iaaress, provid	e ariving a	irections. Aa
	Rhodia	is located im	mediately north o	f Highway 19	along the	e east
1275 Airline Highway, Baton Rouge, LA 70805	t tiround			· · · · · · · · · · · · · · · · · · ·	<u> </u>	
1275 Airline Highway, Baton Rouge, LA 70805. bank of the Mississippi River.		•				
1275 Airline Highway, Baton Rouge, LA 70805. bank of the Mississippi River.		-				
	D.1)					

#### Modifications Addressed in Permit Application Forms:

- Emissions of hydrochloric acid and chlorine from the Unit 1 (RLP 0014) and Unit 2 (RLP 0013) Sulfuric Acid Regeneration Unit (SARU) stacks are being reconciled based upon recent stack test data and conservative assumptions used to extrapolate the existing data. Hydrochloric acid emission rates are being decreased while chlorine emissions are being increased for an overall slight increase in these Class III TAPs. Also, the VOC emissions from the Unit 1 and Unit 2 SARUs are being reconciled to use a lbs/ton emissions factor calculated from stack test data instead of using the straight lbs/hr stack test result. Because the annual emissions for Units 1 and 2 are part of emission caps, multiple EIQ sheets are affected (RLP 0014 and RLP 0013 for max hourly emissions, CAP-Comb for average/annual total VOCs, and CAP-SAU for average/annual chlorine and hydrochloric acid emissions).
- The Package (ABCO) Boiler (EQT 0153) is being combined in emissions cap "CAP-Comb" (with no change in overall emissions) to better reflect its function as supplemental/backup steam to the Unit 1 and Unit 2 SARUs which are the primary steam-generating units for the site. Revised EIQ sheets for the Package Boiler and CAP-Comb are included.
- The Treatment Services Vapor Combustor (TSVC, EQT 0147)) and Acid Plant Vapor Combustor (APVC, EQT 0151) emissions are being reconciled based upon recent stack test data.
- General Condition XVII Activities and Insignificant Activities are being updated/revised.
- Minor adjustment in RLP 0013 and RLP 0014 stack parameters using more recent design data

#### Other Modifications/Corrections:

- Change SR 12 to say "Because this scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubber unit. All specific requirements and emission limits will continue to apply." This change is needed because the permits referred to by the existing SR 12 have been rescinded, thus if a substitute scrubber is used, it will simply comply with the same requirements as the primary unit.
- SR 306 is incorrect for source EQT 0291; it mentions "sweet natural gas" whereas this is a diesel engine. Also note that this regulation (LAC 33:III.1101.B) has been revised such that the exception now reads "except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes".
- LAC 33:III.1101.B is assigned to many other sources and should reflect the revised regulatory language, if possible
- On page 23 of the Air Permit Briefing Sheet (LDAR program streamlining), item a refers to "LA MACT for Refineries". This should state "LA MACT Determination for non-HON Facility Equipment Leaks"
- The Emission Rate Tables have 3 sets (phases) of SO2 emission rates. Note that we are now in Phase II thus Phase I can be deleted.
- Due to emissions rate reconciliation, the total permitted HAPs will increase from 8.92 to 9.18 tons per year. The total HAPs for the Acid Plant are sum of (TAP CAP on PCS 0001; TAP CAP on PCS 0002; HCl and Cl2 emissions from CAP-SARU, TSVC, APVC; HAP metals from CAP-SARU; CS2 from sulfur feed tank; gasoline tank HAPs). SR 364 addresses the total HAP limit and needs to be updated.
- The "Emission Rate Notes" at the end of the Emission Rate Tables for pollutant "Toxic Air Pollutants" on process groups PCS 0001 and PCS 0002 need to be revised. The text after the second sentence is incorrect (confuses TAPs and HAPs) and should be truncated.
- There is a typo in item GC5, should say "spent" instead of "spend"

3. Confid	entiality [L	AC 33.I.Cl	napter 5]						
Are you requ	esting confider	ntiality for any	v information <u>except</u>	air pollutan	t emissi	ion rates?		☐ Yes	■ No
submittal the	t the sections f at is separate fi Consult instru	rom this appli	fidentiality is requestication. Information	sted below. I for which co	1dd rov onfideni	vs as necesso tiality is requ	ary. Confiden ested should	ntiality reque not be submi	sts require a tted with this
4. Type o	f Application	on ILAC 3	3:111.517.DI						
			2) that corresponds	to the type	of per	rmit being so	ought. Check	all that app	ly within the
appropriate of	column.	***************************************							
Column 1		·	4.4.4	Colu	nn 2				
☐ Part 70	General				Part 70	Regular			
Renew	al				Renew	al			
Select one, i	f applicable:			Select	one, if a	pplicable:		·	
☐ Entirel	y new facility				Entirel	y new facility			
Modifi	ication or expansi iliations)	ion of existing f	acility (may also includ	le 🗆			on or expansions) [LAC 33:III.		cility (may also
☐ Recone	ciliation only						r expansion of e s) [LAC 33:III.		(may also
- Individ	lual emissions un	it(s) addition			Recond	ciliation only			
Individ	idai omiosions an	11(3) 444111011		NSR	Analysis				
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			· · · · · · · · · · · · · · · · · · ·		100		· · · · · · · · · · · · · · · · · · ·		
If yes, provid Select one if	de date that the this application	<i>prior applica</i> n is for an exi	application currentl tion was submitted: sting facility that doe			☐ ality permit:	Yes <b>■</b>	No	
☐ Previo	ously Grandfath	ered (LAC 33	3:III.501.B.6)						
☐ Previo	ously Exempted	(e.g., Small S	Source Exemption; L	AC 33:III.50	1.B.2.d	1)			
Previo	ously Unpermit	ted							
. —									
Fee Parame	ere. <u>per ton dail</u> Category: Ente the facility. CC:	ode is based o	on an operational par	ation (SIC) a					
Project Fee 2. Add rows	Calculation: Es to this table as	enter fee code needed. Incl	, permit type, produc ude with the applica	tion capacity tion the amo	/throug int in tl	thput, and fee ne Grand Tota	amount pursual blank as the	uant to LAC 3	33:III.Chapter cation fee.
		EVICTRIC	INCREMENTAL			<u>SURCHAR</u>	GES		TOTAL
FEE CODE	TYPE	EXISTING CAPACITY	CAPACITY INCREASE	MULTIPI	IER	NSPS	PSD	AIR TOXICS	AMOUNT
0540	minor								\$ 1,556.00

\$ 1,556.00

GRAND TOTAL

**Optional** Fee Explanation: Use area will help to avoid confusion.	the space provided to give an explanation of the	e fee determination displayed above. Using this
Minimum minor mod fee applies	per LAC 33:III.211.B.13.d. Emissions are	being reconciled only.
Electronic Fund Transfer (EFT): I EFT Transaction Number, the Date the application fee using EFT, leave blank EFT Transaction Number	at the EFT was made, and the total dollar amou	lectronic Fund Transfer (EFT), please include the unt submitted in the EFT. If not paying the permit  Total Dollar Amount  \$
6. Key Dates		
Estimated date construction will comm	nence: Estimated date	operation will commence:
LDEQ as of the date of submittal of during the permit review process, unl	this application. If none, state "none" in the ess requested by LDEQ. **	been submitted, but have not been acted upon by table. **It is not necessary to update this table
Process Unit Name	Permit Number	Date Submitted
none		
renewals -  Does the company or owner have fede you are applying in Louisiana or other entities who own a controlling interest	ral or state environmental permits identical to, r states? (This requirement applies to all indiv	, or of a similar nature to, the permit for which
If yes, list States:		
Do you owe any outstanding fees or fit If yes, explain below. Add rows if nec		☐ Yes ☐ No
Is your company a corporation or If yes, attach a copy of your compan State. The appropriate certificate(s)	itmitea itavitity company: — 105 =	No icate of Good Standing from the Secretary of ation as an appendix.

If yes which addition the Ex	check the appropriate boxes to indicate the type on the shield is being requested. Give an explanation ional pages if necessary. If additional pages are use explanation field.	f permit shield being sought. Include n of the circumstances that will justi	le the specific regulatory citation(s) for fy the permit shield request. Attach
Type	of Permit Shield request (check all that apply):		
	Non-applicability determination for:	Specific Citation(s)	Explanation
	40 CFR 60		
	40 CFR 61		
	40 CFR 63		
	Prevention of Significant Deterioration		
	Nonattainment New Source Review		
			· .
	nterpretation of monitoring, recordkeeping,  I/or reporting requirements, and/or means of  compliance for:	Specific Citation(s)	Explanation
	40 CFR 60	·	
	40 CFR 61		
	40 CFR 63		
	Prevention of Significant Deterioration		,
	Nonattainment New Source Review		
	State Implementation Plan (SIP)) Regulation(s) referenced in 40 CFR 52 Subpart T		

# 10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application. For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

For corporations only: By signing this form, I certify that, in accordance with the definition of Responsible Official found in LAC 33:III.502, (1) I am a president, secretary, treasurer, or vice-president in charge of a principal business function, or other person who performs similar policy or decision-making functions; or (2) I am a duly authorized representative of such person; am responsible for the overall operation of one or more manufacturing, production, or operating facilities addressed in this permit application; and either the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or the delegation of authority has been approved by LDEQ prior to this certification.\*

CERTIFICATION: I certify, un	der provision	s in Louisiana and	CERTIFIC	CATION: I certify the	nat the engine	ering calculations,	
United States law which provide	le criminal p	enalties for false	drawings,	and design are true a	ınd accurate t	to the best of my	
statements, that based on inform	nation and be	elief formed after	knowledge	•		Ì	
reasonable inquiry, the statements	and informatio	n contained in this	;				
Application for Approval of Emiss	sions of Air Pe	ollutants from Part	ļ.				
70 Sources, including all attachm	ents thereto a	nd the compliance				İ	
statement above, are true, accurate,	and complete.						
			h Drofossi	ional Engineer			
a. Responsible Official			Name	ional Eligineer			
Name			Tidino	Julie Baron Sheffi	eld		
Daniel Tate	<del> </del>	<del></del>	Title	Odno Baron Onom			
Title		**	THE	Environmental Co	ngultant		
Plant Manager		***	Camananyi	Liferioninental CC	Hoditant		
Company			Company	IDC L L C			
Rhodia, Inc.		"Hij		JBS, L.L.C.			
Suite, mail drop, or division			Suite, mail	drop, or division			
					·		
Street or P.O. Box			Street or P				
PO Box 828			PO Box 828				
City	State	Zip	City		State	Zip	
Baton Rouge	LA	70821		Baton Rouge	LA	70821	
Business phone			Business p	hone			
(225) 359-3751			(225) 359-3432				
Email Address		·	Email Address				
Daniel.Tate@ US.RI	HODIA com			Julie.Sheffield@U	S.RHODIA.co	m	
Signature of responsible official (		12)	Signature	of Professional Engine			
Signature of responsible official (	366 40 CITC 70	,, <u>,,,</u>					
1 South 75			JBSheffield				
Date		· · · · · · · · · · · · · · · · · · ·	Date /	12-15-20	1		
12/1-/2			/	12-15-20	7 [ ]		
12/15/20//							
*Approval of a delegation of author	ority can be rec	luested by	Louisiana	Registration No.	7.124	24677	
completing a Duly Authorized Rep	oresentative De	esignation Form		HUNGTATE OF	LOUISE		
(Form_7218) available on LDEQ's	s website at	O - foult come		yar ★ 🌡	19/1/4		
http://www.deq.louisiana.gov/port	ai/tabid/2/58/	Default.aspx	_	JULIE X		•	
				REG. No.	BARON		
				A Professional	RED	•	

11. Personnel [LAC 33:111.517.D.1] a. Manager of Facility who is located at plant site				b. On-site contact regarding air pollution control				
	D: 0 /				tomener i ugan anng ann		rimary Contact	
Name		LJ ·	Tilliary Contact	Name	John Richardson		Ť	
	Daniel Tate			Title	JOHN Monardson			
Title	Dissi Managan			Title	Environmental Ma	nager		
_	Plant Manager		<del></del>	Company	Ellation there is a			
Company	District to a			Company	Rhodia, Inc.			
	Rhodia, Inc.			Cuita mail	drop, or division	<u> </u>		
Suite, mail o	drop, or division			Suite, man	thop, or division			
Street or P.C	D. Box			Street or P	.O. Box	****	***	
	PO Box 828				PO Box 828			
City		State	Zip	City		State	Zip	
City	Baton Rouge	LA	70821		Baton Rouge	LA	70821	
Business ph				Business p	hone			
Dusiness pri	(225) 359-3751			1	(225) 359-3768			
Email Addr				Email Add	lress			
Elliali Addi	Daniel.Tate@ US.RI	AUDIA com			John.Richardson@	us.RHODIA.	com	
	Daniel. rate@ US.Ki	TUDIA.CUIII			3011111110113130			
a Parson to	o contact with written	corresponder	ice	d. Person	who prepared this re	eport		
	Contact with written		Primary Contact	Name			Primary Contact	
Name	t t By t and an		Timary Contact		Julie Sheffield		·	
	John Richardson			Title	Julie Officiació		<del></del>	
Title					Environmental Co	neultant		
	Environmental Man	ager		Commons	Environmental co	mountain.		
Company				Company	JBS, LLC			
	Rhodia, Inc.	· · · · · · · · · · · · · · · · · · ·		Cuite mai				
Suite, mail	drop, or division			Suite, mai	l drop, or division			
	·				NO Description		<u></u>	
Street or P.				Street or F				
	PO Box 828				PO Box 828	Ct-to I	Zip	
City		State	Zip	City	<b>.</b>	State	70821	
	Baton Rouge	LA	70821		Baton Rouge	LA	70021	
Business pl	none			Business 1				
	(225) 359-3768				(225) 359-3432			
Email Addı	ress			Email Ad				
	John.Richardson@	US.RHODIA.c	<u>om</u>		Julie.Sheffield@U	S.RHODIA.co	<u>m</u>	
							<u>.</u>	
e. Person t	o contact about Annu	al Maintenan	ce Fees		110			
Name				Street or I			-	
	John Richardson				PO Box 828			
Title				City		State	Zip	
	Environmental Mar	nager			Baton Rouge	LA	70821	
Company	<u> </u>			Business	phone			
-	Rhodia, Inc.				(225) 359-3768			
Suite. mail	drop, or division	····		Email Ad	dress	:		
			•		John.Richardson(	@US.RHODIA	.com	

12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
The pollutants being modified are listed below. Other p brevity, are not listed below.	ollutants will remain at currently permitted rates and, for
PM: o	. 58.43
SO₂	phase II: 4726.23
SO <sub>2</sub>	phase III: 1078.06
NOx	118.64
СО	103.81
VOC Total	29.58
chlorine	. 1.74
hydrochloric acid	4.34
total HAPs (not same as total TAPs)	9.18

## 13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.
- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued	
0840-00033-V0	October 12, 2005	
0840-00033-V1	March 14, 2007	
0840-00033-V2	November 30, 2009	
0840-00033-V3	May 11, 2011	
Temporary Gasoline Tank - Case-by-Case Notification of Insignificant Activity	July 6, 2011	

		•			
14.a.	<b>Enforcement Actions</b>	[LAC 33:HI.517.D.18]	l- 🗆	Yes	No

If yes, list all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility and/or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit. For each action, list the type of action (or its tracking number), the regulatory authority or authorities that issued the action, and the date that the action was issued. Summarize the conditions imposed by the enforcement action, settlement agreement, and consent decree in Section 23, Table 2. It is not necessary to submit a copy of the referenced action. Add rows to table as necessary.

Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?
			☐ Yes ☐ No

14.b. Schedule If the facility or proceedescription of how coinstructions.	ss unit for w	hich app	plicatio	n is being made is r	ot in f	□ full complianc ompliance bei	e with all app	No plicable vs as ne	regulations cessary. Sec	, give (	a
15. Letters of A If yes, list all correspond of compliance with an issuance of the letter at table. Letters that are	ondence with ny applicable and the regula	LDEQ, regulati ation ref	EPA, of ions for ference	or other regulatory be this facility or prood d by the letter. Atta	odies ess un ach as	that provides ait (for process an appendix	for or suppor s unit-specific a copy of all	e permit I <b>docum</b>	ts). List the tents refere	date of	f
Date Letter I	ssued		Issuing	g Authority		Referenced I	Regulation(s	)	Copy o	of Lett ched?	
	-	-							☐ Yes		No
							****		☐ Yes		No
16. Initial Notification of the process unit (for process unit (for process unit in order to satisfied should should also be proper	notifications of ess unit-spec- sfy regulator be listed in S	that have ific pern y require ection 2	re been mits) sin ements 23, Tab	submitted or one-ting the issuance of a control of a control of a control of the control of the control of this applications.	ne per the cur ation o	formance test rently effective or one-time pe ny notification	s that have be ve Title V Op erformance te ns or perform	erating est requi nance te	Permit or Strements that	tate Op t have	erating not
Initial Notif One-time Perfo		:?	Regul	atory Citation Sati	sfied	Applicable	e Source(s)	C	Date ompleted/A		ed
Initial 30-Day NOx Pe Package (AB EQT 0	CO) Boiler,	est for	40 CF	FR 60.8 and 60.46	ib(e)			Submi	tted to LDE	EQ 8/3	0/11
NOx CEMS Initia Evaulation for Packa EQT (	ige (ABCO) E		40 CF	R 60.13(c) and 60.4	9b(b)			Submi	tted to LDE	EQ 7/2	8/11
17. Existing Pr Limitations [LA Do one or more Yes If "yes," summarize t annual emissions lim	C 33:III.5 emissions son No he limitations	17.D.1 urces re	[ <b>8]</b> epresent such per	ted in this permit ap	<i>plicat</i> ring tal	ion currently	operate unde	er one o	r more NSR	permit	ts?
Permit Number	Date Issued	Emis	ssion	Pollutant		CT/LAER Limit <sup>1</sup>	Averaging Period		escription o anology/Wo Standa	rk Pra	
		<u> </u>									

<sup>1</sup>For example, lb/MM Btu, ppmvd @ 15% O2, lb/ton, lb/hr

## 18. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality Dispersion Modeling is only required when applying for PSD permits and as requested by LDEQ.)

☐ Yes ■ No

Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of a air permit application previously submitted for this facility or process unit (for process unit-specific permits) or as required by other regulations AND approved by LDEQ?

■ Yes □ No

If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:

For sulfuric acid: 10/6/2008; for TAP metals: May 2009; for other TAPs: March 2005; for SO2, approximately August 2004. The sulfuric acid modeling was submitted as part of a permit application because initial analysis indicated a PSD major modification. Analysis was later revised and the PSD application was withdrawn.

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	(National Ambient Air Quality Standard {NAAQS})
Sulfuric Acid	8-hour	22.32 μg/m <sup>3</sup>	23.8 μg/m <sup>3</sup>
	annual	21.88 μg/m <sup>3</sup>	80 μg/m <sup>3</sup>
SO2 Phase I emission rates (no longer in effect)	24-hour	335.04 µg/m <sup>3</sup>	365 μg/m³
in enecty	3-hour	1017.57 µg/m <sup>3</sup>	1300 µg/m³
Antimony (and compounds)	8-hour	0.46624 µg/m3	11.9 µg/m3
Arsenic (and compounds)	annual	0.00004 μg/m3	0.02 μg/m3
Barium (and compounds)	8-hour	0.88404 µg/m3	11.9 µg/m3
Chromium VI (and compounds)	annual	0.00004 μg/m3	0.01 μg/m3
Copper (and compounds)	8-hour	0.40913 μg/m3	23.8 µg/m3
Manganese (and compounds)	8-hour	0.27827 μg/m3	4.76 μg/m3
Nickel (and compounds)	annual	0.00004 µg/m3	0.21 μg/m3
Selenium (and compounds)	8-hour	0.35001 μg/m3	4.76 µg/m3
Zinc (and compounds)	8-hour	0.80561 µg/m3	119 μg/m3
MIBK	8-hour	323 μg/m <sup>3</sup>	4880 µg/m³
Dichloromethane	annual	0.86668 µg/m3	212.77 µg/m3
Acrylonitrile	annual	1.152 μg/m³	1.47 μg/m <sup>3</sup>
1,3-Butadiene	annual	0.723 μg/m <sup>3</sup>	0.92 μg/m <sup>3</sup>
Chlorine	8-hour	26.71 μg/m <sup>3</sup> *	35.7 µg/m³
Hydrochloric acid	8-hour	134.82 µg/m <sup>3</sup>	180 µg/m³

<sup>\*</sup> Because this permit application proposes to increase permitted emissions of chlorine and HCl from some sources, Rhodia will update the modeling and forward results to LDEQ upon request.

#### 19. General Condition XVII Activities -

Yes 🗆 No

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- Expand this table as necessary to include all such activities.
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.

ID				Ē	mission Rate	es – TP	Y	
No.	Work Activity	Schedule	$PM_{10}$	SO <sub>2</sub>	NO <sub>x</sub>	co	VOC	Other
Note:	Edits from current GCX	VII List shaded gray.						
GC 1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 12 months per unit	0.2					
GC 2	Drum re-packaging	4 times per year					0.002	
GC 3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly		0:06			0.06	
GC 4	Tank and process equipment cleaning			0.1			0.90	
GC 5	Opening of trucks and railcars containing waste fuel and spent acid for sampling, inspection, maintenance, or further processing	Daily		0.5			0.1	
GC 6	Sampling waste fuel trucks railcars; and tanks via sample tap	10 times per day					0:03	##
GC 7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day		0.004			0.004	
GC 8	Washing inside surface of Unit 1 exhaust stack	2 times per year			0,25			0:01*
GC 9	Odor-neutralizing compounds						0.06	
GC 10	Manual gauging of tank levels			0.5	, , , , , , , , , , , , , , , , , , , ,		0.1	
	Melting sulfur solidified in piping and other equipment at the old sulfur pit (former EIQ ID 18)			<0.001				<0.001#
GC 12	Sampling for moisture content, stack gauging, and pressure readings from gas streams			0.1				0.1*
GC 13	Loading fresh acid onto heel of spent acid			0.003			0.004	
GC 14	Acid Plant Vapor Combustor (APVC) routine maintenance	240 hrs per year (max)					4:62	**
GC 15	Unloading containers of spent acid with chlorinated VOCs (carbon bed for VOCs, caustic scrubber if any SO2 present)	1 per week		0.1			0.06	**

<sup>\*</sup> Sulfuric Acid Mist

<sup>#</sup> Hydrogen Sulfide

<sup>\*\*</sup> Speciated VOCs covered by Spent Acid Process permitted emissions

<sup>##</sup> Speciated VOCs covered by TS Process permitted emissions

20. Insig	nificant Activities [LAC 33:III.501.B.	<b>5</b> ] ■ Yes □	No
Enter all acti	vities that qualify as Insignificant Activities.		
• Expand this	s table as necessary to include all such activities.		
• For sources	s claimed to be insignificant based on size or emis	sion rate (LAC 33:III.501.B.5.A), infor	mation must be supplied to verify
each claim.	This may include but is not limited to operating ho	ours, volumes, and heat input ratings.	
<ul> <li>If aggregate</li> </ul>	e emissions from all similar pieces of equipment (	i.e. all LAC 33:III.501.B.5.A.1 activitie	es) claimed to be insignificant are
	5 tons per year for any pollutant, then the activitie	es can not be claimed as insignificant an	id must be represented as
	nission sources. Consult instructions.		
Emission Point ID	Description	Physical/Operating Data	Citation
No.	Description	I hysican operating sum	
			•
Note: Edit	s from current IA list are shaded gray.		
20D962	Diesel Storage Tank, Firewater Pump	300 gals	LAC 33: III.501.B5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gals	LAC 33: III.501.B5.A.3
None	Diesel Storage Tank, IFS	1000 gals	LAC 33: III.501.B5.A.3
91D321	IFS Wash-water Storage Tank	9000 gals	LAC 33: III.501.B5.A.3
90D210	Laboratory Excess Sample Tank	100 gals	LAC 33; III.501.B5.A.2
Hoods	Different Analyses*	N/A	LAC 33: III.501,B5,A.6
	Drum Washing Operations	55 gals	LAC 33: III.501.B5.A.7
None	Temporary (Seasonal) Portable Gasoline Tank	550 gals	LAC 33: III 501 B5 A 8
purpose of q	ciated with exhaust hoods for laboratory equipmer uality control or environemental monitoring purpos   Ilatory Applicability for Commonly A  [.D.10]	ses.	
Does this fac	cility contain asbestos or asbestos containing mat	terials? <b>Tes</b> No	
	facility or any portion thereof may be subject to 4 lication must address compliance as stated in Sect		pter 27, and/or LAC 33:III.5151
same facility. If "yes," the	or process unit represented in this permit subject as the process unit represented in this application entire facility is subject to 40 CFR 68 and LAC 3. 3 of this application.	on subject to 40 CFR 68?	Yes ☐ No
Is the facility	v listed in LAC 33:III.5611		
Table 5	Yes No		
Table 6	- Vas E No		

Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at this facility or process unit?

Yes 

No

If "yes," the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of this application.

Table 7

Yes

□ No

## 22. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping

Important points for Table 1 [LAC 33:III.517.D.10]:

• List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.

• Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.

- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular emission
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC 33:III.2103 Storage of Volatile Organic Compounds would never apply to a steam generating boiler, no matter the circumstances.
- Consult instructions.

Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been fulfilled.
- Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be employed. It is not sufficient to state that all compliance options will be employed, though multiple compliance options may be approved as alternative operating scenarios.
- Consult instructions.

Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the exemption or non-applicability status of the regulation to that source.
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into the Citation Providing for Exemption or Non-applicability column.
- Consult Instructions.

Important points for Table 4 [LAC 33:III.517.D.18]

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not route its emissions in this manner.
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise appear in this permit application.
- Consult instructions.

#### TABLE 1: APPLICABLE LOUISIANA AND FEDERAL AIR QUALITY REQUIREMENTS

Note: This table lists regulations that are commonly applicable to many sources, but is not intended to be an all inclusive list. Alter the headings of this table as necessary in order to address <u>ALL</u> potentially applicable requirements.

Source	Descriptive Name of the Saures									33:III.C								
ID No.:	Descriptive Name of the Source	5	9	11	13	15	2103	2104	2111	2113	2116	2123	22	29	51	53	56	59
			ļ															
			<u> </u>	<u> </u>	<u>l</u> .	<u> </u>							<u> </u>					
			iana.	seith th	ia mar	aaid maa	. difi4	lian an	nlinat	~~				ı	ı		1	
There a	re no changes to applicable r	egula:	tions \	vith th	is peri	mit mo	dificat	ion ap	plicati	on.								
There a	re no changes to applicable r	egula	tions \	vith th	is peri	mit mo	dificat	ion ap	plicati	on.								
There a	re no changes to applicable r	egula	tions (	with th	is peri	mit mo	dificat	ion ap	plicati	on.								

Blank - The regulations clearly do not apply to this type of emission source.

Source	Descriptive Name of the Source		40 C	FR 60 1	NSPS		4	0 CFR	61			40 C	FR 63				40 CFR	
ID No.:	Descriptive Name of the Source	A	Kb	Db	VV		A	F	V	A	F	G	H			64	68	82
									<u> </u>									
There a	re no changes to applicable r	egulat	ions v	vith th	is perr	nit mo	dificat	ion ap	plicat	ion.								<u> </u>
			<u> </u>	<u> </u>		<u> </u>	ļ			ļ								
				<u> </u>			<del> </del>			<del> </del>					<del> </del>			
	-						ļ								-			<b></b>
			<del> </del>				<del> </del>	ļ		<del>                                     </del>					-	-		
		<u> </u>	<u> </u>	<u> </u>		<u> </u>	1		<u></u>				<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u>L</u>	

#### KEY TO MATRIX

- 1 (Applicable) The regulations have applicable requirements that apply to this particular emissions source. This includes any monitoring, recordkeeping, or reporting requirements.
- 2 (Exempt) The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- (Does Not Apply) The regulations do not apply to this emissions source. The regulations may have applicable requirements that could apply to this emissions source but the requirements do not currently apply to the source due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place.

Blank - The regulations clearly do not apply to this type of emission source.

#### TABLE 2: STATE AND FEDERAL AIR QUALITY REQUIREMENTS

For each Emission Point ID Number:

- · List each regulation that applies.
- Arrange the requirements imposed by each regulation according to the headings provided below.
  Repeat this process for each regulation that applies to each source.
  State-only Requirements should be noted as such in the appropriate column.

Emission Point ID No.:	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement
nere are n	o changes to applicab	le requirements with this permit modification appl	ication.	<del></del> 1	<del></del>
		-			
	-				
				i i	

## TABLE 3: EXPLANATION FOR EXEMPTION STATUS OR NON-APPLICABILITY OF A SOURCE

Emission Point ID No:	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
There are no cha	anges to applicable re	equirements with this permit	modification application.	

The above table provides explanation for either the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Table 1 of this application.

## TABLE 4: EQUIPMENT LIST

Enter each single emission point that routes its emissions to another source (i.e., a control device) or a common stack, or is part of an Emissions Cap. List the emissions source to which each single emission point is routed or the Cap of which the source is a member, if applicable. Consult instructions.

ly lists CHANGES from current	permit RIP 0014 RIP 0			
the Group.	po 112. 0014, 1121 0	0013, and EQT 0186 are alrea	dy part of GRP 0021; we are	e requesting to add
Sulfuric Acid Unit 1, criteria pollutants only	1953	CAP-Comb (GRP 0021)	900 TPD Acid Produced	no new reqts
Sulfuric Acid Unit 2, criteria pollutants only	1968	CAP-Comb (GRP 0021)	1900 TPD Acid Produced	no new reqts
Package (ABCO) Boiler	1990	CAP-Comb (GRP 0021)	106 MMBTU/hr	no new regts
Rental (Holman) Boiler	2006	CAP-Comb (GRP 0021)	133 MMBTU/hr	no new reqts
	Sulfuric Acid Unit 1, criteria pollutants only Sulfuric Acid Unit 2, criteria pollutants only Package (ABCO) Boiler	Sulfuric Acid Unit 1, criteria 1953 pollutants only Sulfuric Acid Unit 2, criteria 1968 pollutants only Package (ABCO) Boiler 1990	Sulfuric Acid Unit 1, criteria 1953 CAP-Comb (GRP 0021) pollutants only Sulfuric Acid Unit 2, criteria 1968 CAP-Comb (GRP 0021) pollutants only Package (ABCO) Boiler 1990 CAP-Comb (GRP 0021)	Sulfuric Acid Unit 1, criteria 1953 CAP-Comb (GRP 0021) 900 TPD Acid Produced pollutants only Sulfuric Acid Unit 2, criteria 1968 CAP-Comb (GRP 0021) 1900 TPD Acid Produced pollutants only Package (ABCO) Boiler 1990 CAP-Comb (GRP 0021) 106 MMBTU/hr

## 23. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:III.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common emissions point. Note any emissions sources that route to this common point in Table 4 of the application.
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
  - 1. Sources that combust multiple fuels
- 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or
  - 1. Equipment leaks.
  - Non-equipment leaks (i.e. road dust, settling ponds, etc).

#### For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form. http://www.deq.louisiana.gov/portal/DIVISIONS/AirPermits/AirPermitApplications.aspx

## 24. NSR Applicability Summary [LAC 33:III.504 and LAC 33:III.509]

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC 33:III.504 or in LAC 33:III.509) proposing to permit a physical change or change in the method of operation. It would also apply to existing minor stationary sources proposing a physical change or change in the method of operation where the change would be a major source in and of itself. Add rows to each table as necessary. Provide a written explanation of the information summarized in these tables. Consult instructions.

# PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	NA	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	•	0	0	
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	•	0	0	AAE - Section 10
517.B.3 Certification	Does the Application Include Certification by a Professional Engineer or their Designee:	•	0	0	AAE - Section 10
517.D.1 Identifying Information	Does the Application Include:				-
	1. Company Name, Physical and Mailing Address of Facility?	•	0	0	AAE - Section 2
	2. Map showing Location of the Facility?	•	0	0	Appendix A
	3. Owner and Operator Names and Agent?	•	0	0	AAE - Section 1
	4. Name and Telephone Number of Plant Manager or Contact?	•	0	0	AAE - Section 11
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	0	0	•	No change from current permit
	Does the Application Include the Source's SIC Code?	•	0	0	AAE - Section 5
	Does the Application Include EPA Source Category of HAPs if applicable?	0	0	•	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	•	0	0	AAE - Section 24
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	0	•	0	No change from current permit
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	•	0	0	AAE - Sections 2, 12, 24
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	•	0	0	Appendix B
517 D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	0	0	•	No change from current permit
517.D.9 Calculations	Are Emission Calculations Provided?	•	0	0	Appendix B
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	0	0	•	No change from current permit

# PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	0	0	•	No change from current permit
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33.III.5111)?	0	0	•	
517,D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	•	0	0	Appendix C
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K,	0	0	•	
517 D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	0	0	•	
517.D.16, 18	Has any Additional Information been Provided?	0	•	0	
517.D.17 Fees	Has the Fee Code been Identified?	•	0	0	AAE - Section 5
	Is the Applicable Fee Included with the Application?	•	0	0	
517.E.1 Additional Part	Does the Certification Statement Include a Description of the	•	0	0	AAE - Section 10
	Compliance Status of Each Emission Point in the Source with All Does the Certification Statement Include a Statement that the Source will continue to Comply with All Applicable	•	0	0	AAE - Section 10
70 Requirements 517.E.3 Additional Part 70 Requirements		•	0	0	AAE - Section 10
517.E.4 Additional Part 70 Requirements	Are there Applicable Requirements for which the Source is not in Compliance at the Time of Submittal?	0	•	0	
	Does the Application include a Compliance Plan Schedule?	0	0	•	
	Does the Schedule Include Milestone Dates for which Significant Actions will occur?	0	0	•	
	Does the Schedule Include Submittal Dates for Certified Progress Reports?	0	0	•	
517.E.5 Additional Part 70 Requirements Acid	Is this Source Covered by the Federal Acid Rain Program?	0	•	0	
Rain	Are the Requirements of LAC 33.III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	0	0	•	

# PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.E.6 Additional Part 70 Requirements	Have any Exemptions from any Applicable Requirements been Requested?	0	•	0	No new exemption requests
	Is the List and explanations Provided?	0	0	•	
517.E.7 Additional Part 70 Requirements	Does the Application Include a Request for a Permit Snield?	0	•	0	No new shield requested
	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding	0	0	•	
517.E.8 Additional Part 70 Requirements	for which the Shield is Requested along with the Corresponding Does the Application Identify any Reasonably Anticipated Alternative Operating Scenarios?	0	•	0	·
	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including Source Process and Emissions Data?	0	0	•	
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	0	•	0	
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting for the Change?	0	0	•	No new requirements
	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	•	0	0	cover letter
	Does the Certification also Request that Minor Modification Procedures be Used?	•	0	0.	cover letter
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	0	0	•	
La. R.S. 30:2018 – PSD/NNSR only	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to	0	0	•	
I DEPITITOR OILY	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to the designated public library at no cost to the designated public	0	0	•	

-					;	State of	Louisiana					Date of Sub	mittal
				Emissions i	nventory	Questic	nnaire (El	Q) for Air Pol	lutants			December	2011
Emission Point ID (Alternate ID)	No.		Descriptiv	e Name of the En	nissions Sou	irce (Alt. N	ame)		Approximate Loc	ation of Stack or	Vent (see in	structions)	
•	ļ							Method	28 - "GPS-U	Inspecified	Datum	NAI	83
2	1	•							15 Horizontal		Vertical	3,376,7	34 mN
TEMPO Subject Item	ID No.			Sulfuric A	icia Unit 2			Latitude	30 degrees			hundredths	
RLP 0013		*		•				Longitude	-91 degrees	11 min 3	sec <u>75</u>	hundredths	
Stack and Discharge	Diameter	or Usia	bt of Ctools	Stant Evit	Stack Gas	Flow Sto	ole Coo Evit	Normal	Date of Construc	Percen	t of Annual 1	Throughput t	hrough
	Stack Disch		ht of Stack ve Grade	Stack Exit Velocity	at Condition	ons, L	ck Gas Exit   mperature	Operating Time	or Modification			sion Point	
Characteristics	Area	1 700	ve Grade	Velocity	not at Stan	dard	mperature	(hours per year)	or wiodinication	Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
Change?	4.50 f		130 ft	113.9 ft/sec	108,705	ft³/min	90 °F	8760		25%	25%	25%	25%
Yes	NA f				,			0	Description for the		<u> </u>		
Type of Fuel					-				Parameters (inclue/Parameter	ide units)	Descript	ion	
uel Type of	Fuel		Heat Input	(MM Btu/hr)	Normal On	aratina Pat	e/Throughpu		tons/day	<del></del>	H2SO4 pro		
a b		]					Rate/Through		tons/day		H2SO4 pro		
c l					Design Cap				tons/day		H2SO4 pro		
<u> </u>		Votes			Shell Heigh							. ,	
everage. Emission Point ID	No.				Air Pol	llutant Sp	ecific Infor	mation				<del></del>	
(Alternate ID)			[		Dropes	ed Emission	n Doton						
			1		Fropos	eu emissi	JII Nates	Dormittod	Add Change	Continuous	i		
2		Control Equipment	Control Equipment	HAP/TAP CAS			1	Permitted Emission Rate	Add, Change, Delete, or	Continuous Compliance	Concentra	tion in Gase	s Exiting a
2		Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Average (lb/hr)	Maximum	1	Permitted Emission Rate (tons/yr)	Add, Change, Delete, or Unchanged	Continuous Compliance Method	Concentra	tion in Gase Stack	s Exiting a
Pollutant		Equipment	Equipment	Number	Average	Maximum (lb/hr)	Annual	Emission Rate	Delete, or Unchanged	Compliance	Concentra		s Exiting a
Pollutant PM10		Equipment	Equipment	Number N/A	Average	Maximum (lb/hr) 23.75	Annual	Emission Rate	Delete, or Unchanged U	Compliance	Concentra		s Exiting a
Pollutant PM10 SO2 Phase II and	d III	Equipment	Equipment	Number N/A 7446-09-5	Average	Maximum (lb/hr) 23.75 NA	Annual	Emission Rate	Delete, or Unchanged U	Compliance	Concentra		s Exiting a
Poliutant PM10 SO2 Phase II and NOx	d III	Equipment	Equipment	Number N/A 7446-09-5 N/A	Average	Maximum (lb/hr) 23.75 NA 134.56	Annual	Emission Rate	Delete, or Unchanged U	Compliance	Concentra		s Exiting a
Pollutant PM10 SO2 Phase II and NOx CO	d [[]	Equipment	Equipment	Number N/A 7446-09-5 N/A 630-08-0	Average	Maximum (lb/hr) 23.75 NA	Annual	Emission Rate	Delete, or Unchanged U U U	Compliance	Concentra		s Exiting a
Pollutant PM10 SO2 Phase II and NOx CO VOC Total		Equipment	Equipment	Number N/A 7446-09-5 N/A	Average	Maximum (lb/hr) 23.75 NA 134.56 74.61	Annual	Emission Rate	Delete, or Unchanged U U U U	Compliance	Concentra		s Exiting a
Poliutant PM10 SO2 Phase II and NOX CO VOC Total Antimony (and comp	ounds)	Equipment	Equipment	Number  N/A 7446-09-5 N/A 630-08-0 N/A	Average	Maximum (lb/hr) 23.75 NA 134.56 74.61 2.73	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM10 SO2 Phase II and NOx CO VOC Total	ounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0	Average	Maximum (lb/hr) 23.75 NA 134.56 74.61 2.73 0.671	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM10 SO2 Phase II and NOx CO VOC Total Antimony (and compo	oounds) ounds) ounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM10 SO2 Phase II and NOx CO VOC Total Antimony (and compo	oounds) ounds) ounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9	Average	Maximum (lb/hr) 23.75 NA 134.56 74.61 2.73 0.671 0.001 1.313 0.001 0.001	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM19 SO2 Phase II and NOx CO VOC Total Antimony (and compo Arsenic (and compo Barium (and compo Beryllium (and compo Cadmium (and compo Chromium VI (and com	oounds) ounds) ounds) ounds) ounds) ounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM19 SO2 Phase II and NOx CO VOC Total Antimony (and compo Arsenic (and compo Barium (and compo Beryllium (and compo Cadmium (and compo Chromium VI (and compo Lead compound	oounds) ounds) ounds) ounds) ounds) ounds) ounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3  7439-92-1	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006  0.12	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM19 SO2 Phase II and NOx CO VOC Total Antimony (and compo Arsenic (and compo Barium (and compo Beryllium (and compo Cadmium (and compo Chromium VI (and compo Lead compound Mercury (and compo	pounds) punds) punds) pounds) pounds) pounds) pounds) pounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3  7439-92-1  7439-97-6	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006  0.12  0.013	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM19 SO2 Phase II and NOx CO VOC Total Antimony (and compo Arsenic (and compo Barium (and compo Beryllium (and compo Cadmium (and compo Chromium VI (and compo Lead compound Mercury (and compo Nickel (and compo	pounds) pounds) pounds) pounds) pounds) pounds) pounds) pounds) ds pounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3  7439-92-1  7439-97-6  7440-02-0	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006  0.12  0.013  0.006	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM19 SO2 Phase II and NOX CO VOC Total Antimony (and compo Arsenic (and compo Barium (and compo Beryllium (and compo Cadmium (and compo Chromium VI (and compo Lead compound Mercury (and compo Nickel (and compo	pounds) pounds) pounds) pounds) pounds) pounds) pounds) ds pounds) ds pounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3  7439-97-6  7440-02-0  7782-49-2	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006  0.12  0.013  0.006  0.413	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM19 SO2 Phase II and NOX CO VOC Total Antimony (and compo Arsenic (and compo Barium (and compo Beryllium (and compo Cadmium (and comp Chromium VI (and comp Lead compound Mercury (and compo Nickel (and compo Selenium (and compo Cobalt compound	pounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3  7439-97-6  7440-02-0  7782-49-2  7440-48-4	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006  0.12  0.013  0.006  0.413  0.17	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM19 SO2 Phase II and NOX CO VOC Total Antimony (and compo Arsenic (and compo Barium (and compo Beryllium (and compo Cadmium (and compo Chromium VI (and compo Lead compound Mercury (and compo Nickel (and compo Selenium (and compo Cobalt compound Copper (and comper (and co	pounds) pounds) pounds) pounds) pounds) pounds) pounds) ds pounds) pounds) pounds) pounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3  7439-97-6  7440-02-0  7782-49-2  7440-48-4  7440-50-8	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006  0.12  0.013  0.006  0.413  0.17  0.632	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM1 o SO2 Phase II and NOx CO VOC Total Antimony (and compo Barium (and compo Barium (and compo Cadmium (and compo Chromium VI (and compo Lead compound Mercury (and compo Nickel (and compo Selenium (and compo Cobalt compound Copper (and compo Manganese (and compo	pounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3  7439-97-6  7440-02-0  7782-49-2  7440-48-4  7440-50-8  7439-96-5	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006  0.12  0.013  0.006  0.413  0.17  0.632  0.43	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM1 s SO2 Phase II and NOx CO VOC Total Antimony (and compo Barium (and compo Beryllium (and compo Chromium VI (and comp Chromium VI (and compo Mercury (and compo Nickel (and compo Selenium (and compo Copper (and compo Copper (and compo Manganese (and compo Zinc (and compound	pounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3  7439-97-6  7440-02-0  7782-49-2  7440-48-4  7440-50-8  7439-96-5  7440-66-6	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006  0.12  0.013  0.006  0.413  0.17  0.632	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a
Pollutant PM10 SO2 Phase II and NOx CO VOC Total Antimony (and compo Barium (and compo Barium (and compo Cadmium (and compo Chromium VI (and compo Lead compound Mercury (and compo Nickel (and compo Selenium (and compo Cobalt compound Copper (and compo Manganese (and compo	pounds)	Equipment	Equipment	Number  N/A  7446-09-5  N/A  630-08-0  N/A  7440-36-0  7440-38-2  7440-39-3  7440-41-7  7440-43-9  7440-47-3  7439-97-6  7440-02-0  7782-49-2  7440-48-4  7440-50-8  7439-96-5	Average	Maximum (lb/hr)  23.75  NA  134.56  74.61  2.73  0.671  0.001  1.313  0.001  0.006  0.12  0.013  0.006  0.413  0.17  0.632  0.43  1.24	Annual	Emission Rate	Delete, or Unchanged  U U U U U U U U U U U U U U U U U U	Compliance	Concentra		s Exiting a

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İ		State of Louisiana Emissions Inventory Questionnaire (EIQ) for Air Pollutants														mittal			
	mission Point ID No. Descriptive Name of the Emissions Source (Alt. Name)															2011			
E	mission Point ID (Alternate ID)	1		Descriptiv	e Name of the En	nissions Sou	sions Source (Alt. Name) Approximate Location of Stack or \								ent (see instructions)				
		'						•		Method	28 - "GPS-l	Datum	Datum NAD 83						
	3									UTM Zone	15 Horizontal	Vertical							
TEN	APO Subject Item	ı ID No.			Sulfuric A	cid Unit 1				Latitude	30 degrees								
	RLP 0014									Longitude			min 35 min 14		hundredths				
Stack	and Discharge	Diameter	or		A	Stack Gas	Flow .			Normal			Percen	t of Annual	Chroughput	hrough			
	Physical	Stack Disch	charge   Height of Stack   Stack Exit			at Condition	one   Sta	ck Gas Exit		rating Time   Date of Construction					sion Point	•			
Ch	aracteristics	Area	ADO	ove Grade	Velocity	not at Stan	dard   1e	mperature	(hou	rs per year)	or Modificatio	п	Jan - Mar	Apr - Jun Jul - Sep Oct - Dec					
.	Change?	3.00	ft	130 ft	118.1 ft/sec	50,080	ft3/min	90 °F		8760	•		25%	25%	25%	25%			
	Yes	NA		:		30,000	10711011	90 F		0700			2076	2070	25/6	2070			
	Type of Fue	el Used and	(see instruct						Operating	g Parameters (incl	ıde u	nits)							
Fuel	Type o	f Fuel		Heat Input							e/Parameter			Descript					
а						Normai Ope	erating Rate	e/Throughput			tons/day			H2SO4 pro					
b			İ			Maximum C	perating R	ate/Through	out		tons/day	H2SO4 produced							
С						Design Cap		ne		1080	tons/day			H2SO4 pro	duced				
			Notes			Shell Heigh				1									
	rates are permit			Tank Diame	eter (ft)														
	AU (GRP 0002).		I, SO2 maxi	mum emissi	ons willi be	Roof Type													
regulat	ed as 3-hr averaç	ge.																	
E	Emission Point ID	No.		Air Pol	lutant Sp	ecific Info	mati	on											
	(Alternate ID)	)		Propos	ed Emissio	n Rates		a sanifficat	Add Chara	٠.									
	3		I Equipment I Equipment I		HAP/TAP CAS	Average	Maximum	Annual		ermitted ssion Rate	Add, Change, Delete, or		ontinuous impliance	Concentra		s Exiting at			
		Code		Efficiency	Number	(lb/hr)	(lb/hr)	(tons/yr)		tons/yr)	Unchanged		Method		Stack				
	Pollutant PM10				N/A		11,25	-	<del></del>	u									
	SO2 Phase I	I			7446-09-5		904.17	+		U			,						
	SO2 Phase I				7446-09-5	<del>                                     </del>	NA	<del> </del>	<del> </del>	<del>-</del>									
<del> </del>	NOx			<del>                                     </del>	N/A	<del> </del>	63.27	-			Ü								
<u> </u>	CO				630-08-0		44.26		<del></del>		Ü								
<del> </del>	VOC Total				N/A		0.94	<del> </del>											
Ani	mony (and com	oounds)			7440-36-0		0.466	1			Ü								
	senic (and comp				7440-38-2		0.004	<del>                                     </del>	ļ ——		Ü								
	arium (and comp		<del> </del>		7440-39-3		0.778	1	<u> </u>		Ü		<del></del>	<del>                                     </del>					
	vilium (and com			<del>                                     </del>	7440-41-7	<del> </del>	<0.001		<u> </u>		Ū								
	mium (and com				7440-43-9		<0.001		<b> </b>		Ū			ĺ					
<del></del>	mium VI (and co	·			7440-47-3		0.001		l		U								
	Lead compounds 7439-92-1						0.08		l	,	Ü								
Me	Mercury (and compounds) 7439-97-6						0.011				· U			<u> </u>		••			
	Nickel (and compounds) 7440-02-0						0.003	1			U			1					
	Selenium (and compounds) 7782-49-2						0.373				U			·					
	Cobalt compounds 7440-48-4						0.10	Î			. U								
C	Copper (and compounds) 7440-50-8						0.379				U								
	Manganese (and compounds) 7439-96-5						0.26				Ü								
	Zinc (and compo				7440-66-6		0.75				U								
	Hydrochloric a				7647-01-0		14.87				U								
	Chlorine				7782-50-5		0.21				С								
	Sulfuric acid				7664-93-9	1	5.63	1			U			1					

•

	State of Louisiana  Emissions Inventory Questionnaire /FIQ) for Air Pollutants														mittal		
	Emissions Inventory Questionnaire (EIQ) for Air Pollutants  mission Point ID No. Descriptive Name of the Emissions Source (Alt. Name) Approximate Location of Stack or Ven																
Emission Point II	D No.		Descriptiv					<del>-, -</del>			-4!	-£ Ot1 '					
(Alternate ID						`	•		•	Approximate Loca	vent (see in	structions)					
CAP-SAL	,		_						Method UTM Zone	NA Horizontal	Datum Vertical	NA	IA mN				
TEMPO Subject Ite	m ID No.		C/	AP on Sulfuric	Acid Unit	s1&2			Latitude	NA degrees	sec NA						
GRP 000								Į	Longitude	NA degrees	NA	min NA	sec NA	hundredths			
		<del></del>			011-0	ria		<u> </u>	larmal		Т	Darsont	of Appual 7	Chroughout	through		
Stack and Discharge Physical	Diameter Stack Disch	Height of Stack 1 Stack Exit			Stack Gas at Condition	Sta	ck Gas Exit		erating Time   Date of Construction				ent of Annual Throughput through This Emission Point				
Characteristics	Area	Ab	ove Grade	Velocity	not at Star	' ' I Te			s per year)	or Modification	ו	Jan - Mar		- Jun Jul - Sep Oct			
Change?	NA.	ft						1					25%	25%	25%		
No	NA	ft²	NA ft	NA ft/sec	NA.	ft³/min	NA °F		8760			25%	25%	25%	25%		
Type of Fu	el Used and						Operating	Parameters (inclu	ide ur	nits)							
Fuel Type	of Fuel		Heat Input	MM Btu/hr)					Value	/Parameter			Descript	Pescription			
а						_	e/Throughpu	-									
b							Rate/Through:	put									
С					Design Cap		ne										
		Notes			Shell Heigh			- 1									
This source is a cap of					Tank Diamo	eter (ft)											
0013) for pollutants no		uded in CA	P-Comb		Roof Type												
Emission Point I							ecific Info	rmatic	on								
(Alternate II	)	Control Control LIADSTAN CAS			Propos	ed Emission	on Rates	Pe	Permitted Add, Change,		Continuous		١				
CAP-SAL			ent   Fournment   MAP/TAP CAS		Average	verage Maximum Annual			nission Rate Delete, or		Compliance		Concentration in Gases Exit		es Exiting at		
		Code	Efficiency	Number	(lb/hr)	(lb/hr)	(tons/yr)	(to	ons/yr)	Unchanged	Method						
Pollutant Antimony (and com	anounde)			7440-36-0	0.007	*	0.032		0.032	U							
Arsenic (and com		*****		7440-38-2	0.005	*	0.022	1	0.022	Ü			<u> </u>				
Barium (and com				7440-39-3	0.041	*	0.181	1	0.181	Ū							
Beryllium (and com				7440-41-7	0.003	*	0.012		0.012	U							
Cadmium (and con				7440-43-9	0.003	*	0.012	(	0.012	U							
Chromium VI (and co				7440-47-3	0.007	*	0.030		0.030	U							
Lead compou				7439-92-1	0.02	*	0.08		0.08	Ü							
Mercury (and com	pounds)			7439-97-6	0.003	*	0.012		0.012	U							
Nickel (and compounds) 7440-02-0						*	0.038		0.038	U							
Selenium (and compounds) 7782-49-2						*	0.056		0.056	U							
Cobalt compounds 7440-48					0.01	*	0.03		0.03	U							
Copper (and compounds)				7440-50-8	0.025	*	0.111		0.111	U			•				
Manganese (and co			<u> </u>	7439-96-5	0.02	*	0.08		0.08	U							
Zinc (and compo				7440-66-6	0.05	*	0.22	<u> </u>	0.22	U			<u> </u>				
Hydrochloric	acid		ļ	7647-01-0	0.82	*	3.59	<b> </b>	4.79	С			-				
Chlorine		ļ		7782-50-5	0.39	*	1.70	1	0.09	C			ļ.				
<ol> <li>Sulfuric aci</li> </ol>	d		1	7664-93-9	9.57	1 *	41.90	1	41.90	U			t				

Change? No No NA ft No NA ft Na ft N	. :				•															
Emission Point ID No. (Alternate ID)   CAP-Comb   CAP								State of	Louisian	a						Date of Sub	mittal			
CAP-Combustion   Characteristics   Characteristics   Characteristics   Characteristics   Characteristics   Characteristics   NA ft						<b>Emissions</b>	Inventory	/ Questi	onnaire (E	EIQ) fo	or Air Pol	lutants		December 2011						
Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)   Cap-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (Cap-Combustion)					Descriptiv	e Name of the E	missions So	urce (Alt. N	lame)			Approximate Loc	ation	of Stack or	Vent (see in	ent (see instructions)				
CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler)   CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Package Boiler (CAP-Combustion (Unit 1, Unit 2, Rental Boiler, Packag		CAP-Com	b																	
Carbon   C	TE	MPO Subject Iter	n ID No.	CAP	-Combustion	(Unit 1, Unit :	2, Rental I	Rental Roller Package Roller)												
Physical Characteristics   Above Grade Characteristics   Above Grade Characteristics   Above Grade Characteristics   Above Grade Characteristics   Above Grade Characteristics   Above Grade Characteristics   Above Grade   NA ft   Velocity   NA ft/sec   NA f		GRP 0021	Ī		•		·			Longitude	NA degrees	NA	min NA	sec NA	hundredths	1				
No		Physical haracteristics	Stack Disc Area	charge Above Grade Stack Exit  Above Grade Velocity			at Conditi not at Star	ons, Sta ndard Te	mperature	(hour	Time s per year)	Date of Construction		Jan - Mar	This Emis Apr - Jun	Jul - Sep	Oct - Dec			
Type of Fuel				A ft² NA ft NA ft/sec			INA	107min	INA F					<u> </u>	2076	2070	2070			
Normal Operating Rate/Throughput				l Heat inp																
Maximum Operating Rate/Throughput Design Capacity/Volume   Shell Height (ft)   Tank Diameter (ft)   Tank Diamete	-	l ype o	of Fuel		Heat Input (	MM Btu/nr)	Normal One	erating Rat	e/Throughpu	+	Value	e/Parameter			Descrip	ion				
c         Design Capacity/Volume         Design Capacity/Volume         Shell Height (ft)           This source is a cap of emissions from Unit 1 (RLP 0014), Unit 2 (RLP 0013), Rental Boiler (EQT 0186), and Package Boiler (EQT 0153). Phase III begins 5-1-2012.         Shell Height (ft)         Tank Diameter (ft)           Emission Point ID No. (Alternate ID)         Control Equipment Code         Control Equipment Code         Control Equipment Efficiency         HAP/TAP CAS Number         Maximum (Ib/hr) (Ib/hr) (Ib/hr)         Annual (Ib/hr)         Add, Change, Delete, or Unchanged         Continuous Compliance Method         Concentration in Gases Exiting a Stack           PM1 o         N/A         12.27         * 53.73         51.10         C         Compliance Method         Concentration in Gases Exiting a Stack           SO2 Phase III         7446-09-5         1078.61         * 4724.30         4723.13         C         C           NOx         N/A         25.00         * 109.50         91.93         C         C           Boson Policy         CO         630-08-0         20.54         * 89.98         51.22         C								-												
This source is a cap of emissions from Unit 1 (RLP 0014), Unit 2 (RLP 0013), Rental Boiler (EQT 0186), and Package Boiler (EQT 0153). Phase III begins 5-1-2012.    Emission Point ID No. (Alternate ID)									•	J				,						
Not   Pollutant				Notes	•		Shell Heigh	Shell Height (ft)												
Emission Point ID No. (Alternate ID)	0013)	, Rental Boiler (E																		
Cap-Comb   Control Equipment Code   Control Equipment Code   Co			D No.	1			Air Po	llutant S	oecific Info	rmatio	on									
CAP-Comb   Control Equipment Code   Control Equipment Code   HAP/TAP CAS Number   HAP/TAP CAS Number   Average (lb/hr)   Maximum (lb/hr)   Annual (tons/yr)   Contentration in Gases Exiting a Stack   Concentration in Gases   Concentration in					1		Proposed Emission Rates										*****			
Pollutant         N/A         12.27         *         53.73         51.10         C           SO2 Phase II         7446-09-5         1078.61         *         4724.30         4723.13         C           SO2 Phase III         7446-09-5         245.69         *         1076.13         1074.94         C           NOx         N/A         25.00         *         109.50         91.98         C           CO         630-08-0         20.54         *         89.98         51.22         C			AP-Comb Control		ent Equipment		Average Maximum Annual Emi			ssion Rate	Delete, or	Co	Concentr							
SO2 Phase II         7446-09-5         1078.61         *         4724.30         4723.13         C           SO2 Phase III         7446-09-5         245.69         *         1076.13         1074.94         C           NOx         N/A         25.00         *         109.50         91.98         C           CO         630-08-0         20.54         *         89.98         51.22         C	<u> </u>			<u> </u>			<u> </u>	` ,	<u> </u>	·										
SO2 Phase III         7446-09-5         245.69         *         1076.13         1074.94         C           NOx         N/A         25.00         *         109.50         91.98         C           CO         630-08-0         20.54         *         89.98         51.22         C				<u> </u>									<u> </u>	····						
NOx         N/A         25.00         *         109.50         91.98         C           CO         630-08-0         20.54         *         89.98         51.22         C				<del> </del>											<del>                                     </del>					
CO 630-08-0 20.54 * 89.98 51.22 C				<del>                                     </del>			1	*				1	$\vdash$							
	<del>                                     </del>			1				*				_			<del>                                     </del>					
				1	<del> </del>	N/A		*	19.52	ĺ	8.58	С								
				1																
							<u> </u>		<u> </u>	<u> </u>										

:		State of Louisiana Emissions Inventory Questionnaire (EIQ) for Air Pollutants														
•					Emissions I	Inventory	Questi	ionnaire (E	IQ) fo	or Air Pol	llutants			December	2011	
	ission Point ID (Alternate ID)			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. I	Vame)			Approximate Loca	ation of Stack or	Vent (see in	nstructions)		
	21									Method UTM Zone	28 - "GPS-U 15 Horizontal	Datum Vertical	Datum         NAD 83           Vertical         3,376,685         mN			
TEMPO	O Subject Item EQT147	ı ID No.			TS VAPOR C	OMBUSI	OR			Latitude 30 degrees 30 min 35 se Longitude -91 degrees 11 min 10 se				c 57 hundredths c 81 hundredths		
Ph	d Discharge ysical cteristics	Diameter Stack Disch Area	narge  Heig	ht of Stack ove Grade	Stack Exit Velocity	Stack Gas at Conditi- not at Star	ons, St	ack Gas Exit emperature	Oper	Normal rating Time rs per year)	Date of Construct or Modification	uon į	This Emis	f Annual Throughput through This Emission Point Apr - Jun   Jul - Sep   Oct - I		
1	Change? 6 No N/A			50 ft	4 ft/sec					25%	25%	25%				
	Type of Fue	Used and	Heat Input	(see instruct	tions)					Operating	Parameters (inclu	de units)				
Fuel	Type o	f Fuel		Heat Input	<u>, , , , , , , , , , , , , , , , , , , </u>						e/Parameter	Description				
a	Natura			11				ate/Throughpu			MMBTU/hr			iste vent gas		
b	Waste Vent Gas 0.2							Rate/Through	put		MMBTU/hr	Natur	iste vent gas	3		
<u> </u>			<u> </u>			Design Car		ume		N/A			N/A	······		
			Notes			Shell Heigh					1					
Refer to p	rocess group '	"TS Proces	s" for speci	ated VOC T/	<b>APs</b>	Tank Diam	eter (it)									
<u> </u>					<u> </u>	Roof Type	7t t O	:£:. [£								
Em	ission Point ID							pecific Infor	maud	on	<del></del>		···			
	(Alternate ID)	'	_Control _ Control _ HAP/TAP CAS			' I I I I I I I I I I I I I I I I I I I			P	ermitted	Add, Change,	Continuous	Concontre	ition in Gase	e Eviting at	
	21		Equipment Code	Equipment Efficiency	Number	Average (lb/hr)	Maximui (lb/hr)		Emission Rate (tons/yr)		Delete, or Unchanged	Compliance Method	Concentra	Stack	is Exiting at	
	Pollutant		000		N/A		0.08	0.37								
<u> </u>	PM10 SO2		000		7446-09-5	0.08	0.08	0.37		0.10	C		<b>.</b>			
<u> </u>	NOx		000		N/A	0.88	6.99	3.85		2.58	C					
	CO		000	• • • • • • • • • • • • • • • • • • • •	630-08-0	0.92	6.40	4.04	$\vdash$	0.02	č					
	VOC Total		021		N/A	0.21	0.28	0.92		0.92	Ū					
	Chlorine		000		7782-50-5	0.004	0.03	0.02		0.09	С					
ŀ	lydrochloric ac	cid	000		7647-01-0	0.08	0.52	0.36		0.36	С					
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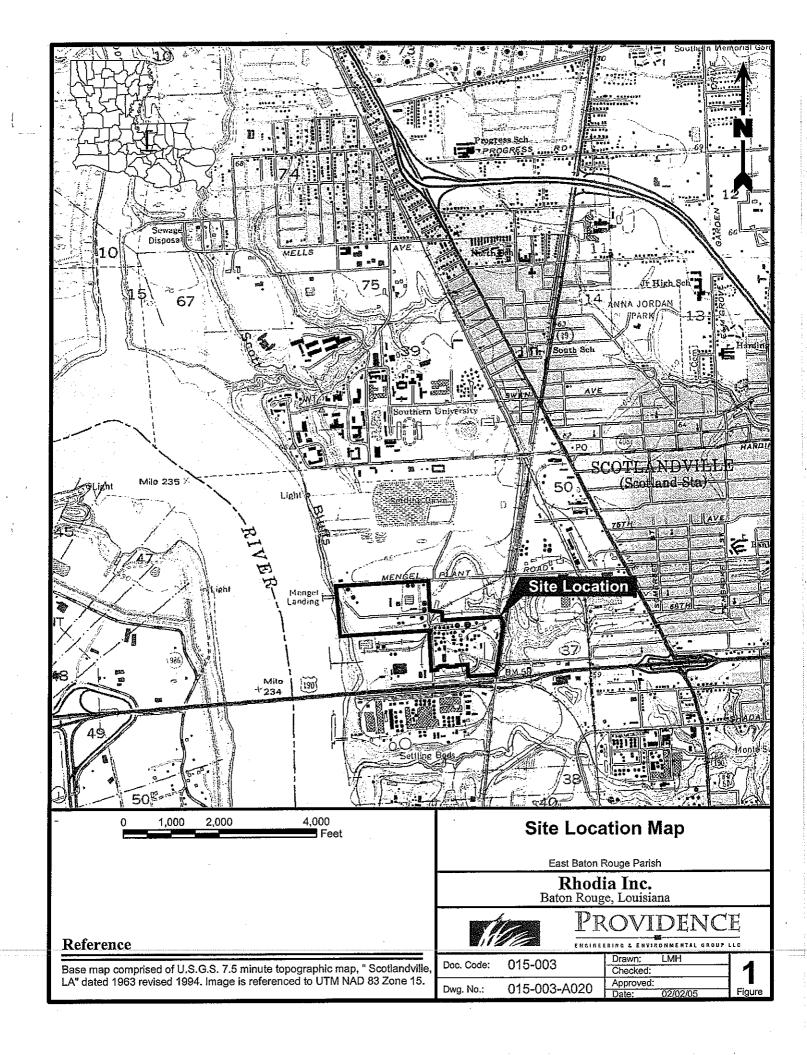
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						;	State c	of Louisian	<b>a</b>						Date of Sub	mittal				
	11				Emissions I	or Air Pol	lutants			ļ	December	2011								
	Emission Point !	D No.		Descriptiv	e Name of the En	•		•		Approximate Location of Stack or Vent (see instructions)										
	(Alternate II	D)			4					•										
	27									Method UTM Zone	28 - "GPS-U 15 Horizontal	Datum. Vertical	Datum NAD 83 Vertical 3,376,697 mN							
	MPO Subject Ite	m ID No		ACII	D PLANT VAP	OR COM	BUSTO	)R		Latitude	30 degrees		<del></del>							
'-					•							sec 44								
	EQT151			_			<u> </u>													
Stac	k and Discharge	Diameter		aht of Stack	Stack Exit									ent of Annual Throughput through						
	Physical	Stack Discl Area	י נמחזמי	ove Grade	Velocity	at Conditions,		I iomnoratiiro i		rating Time	or Modification		lan Mar		his Emission Point pr - Jun   Jul - Sep   Oct - Dec					
٦	haracteristics Change?	ft			not at Standard		1		rs per year)		Jan - Mar		Apr - Jun							
	No No	N/A		35 ft	2.0 ft/sec	2,400	ft³/min	1,350 °F		8760	December 200	)2	25%	25%	25%	25%				
<del></del>	Type of Fu			(see instruc	tions)				•	Operating	Parameters (inclu	ıde ur	nits)	1	· · · · · · · · · · · · · · · · · · ·	,				
Fuel		of Fuel		Heat Input							/Parameter			Descript						
а		ral Gas						tate/Throughpo			MMBTU/hr			al Gas + wa						
b	Waste '	Waste Vent Gas 3.2						Rate/Through	put	6.7 N/A	MMBTU/hr	Natural Gas + waste vent gas								
C		Nete						lume		N/A		<del></del>	<del> </del>							
<del> </del>			Notes		<u></u>	Shell Heigh Tank Diam														
Refer	to process group	"Spent Acid	Process"	for speciated	VOC TAPs	Roof Type	o.c. (11)													
	Emission Point	ID No.				Air Pol	lutant S	Specific Info	rmati	on										
	(Alternate II	D)	0	Control		Propos	ed Emis	sion Rates		ermitted	Add, Change,	Co	ntinuous							
	27	27		27			Control Equipment		HAP/TAP CAS	Average	Maximu	um Annual	1 '	ssion Rate	Delete, or	Compliance		Concentration in Gase		s Exiting at
<u> </u>			Code	Efficiency	Number	(lb/hr)	(lb/hr		(	tons/yr)	, , ,		/lethod		Stack					
<u> </u>	Pollutant PM10		000		N/A	0.01	0.03	0.03	-	0.03 U										
	SO <sub>2</sub>		000		7446-09-5	0.01	0.40			0.04	c c			-	· · · · · · · · · · · · · · · · · · ·					
	NOx		000		N/A	0.29	4.01		$\vdash$	1.05	c									
	CO		000		630-08-0	1.69	15.13		1	3.37	С									
	VOC Tota		021	95.0%	N/A	0.45	7.64	1.95		3.71	С									
	Chlorine		000		7782-50-5	0.005	0.11			0.09	С									
	Hydrochloric	acid	000		7647-01-0	0.09	2.24	0.39	_	0.39	С									
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								State o	of Louisi	ana					Date of Sub	mittal
						Emissions I	nventory	Quest	tionnair	e (EIQ	) for Air Pol	lutants		•	December	2011
		ssion Point II (Alternate ID)			Descriptiv	e Name of the En	nissions Sou	rce (Alt.	Name)			Approximate Location	Vent (see ir	t (see instructions)		
		6-90	•				NI ED /AD	,co,		•	Method UTM Zone	28 - "GPS-Uns 15 Horizontal 6		Datum Vertical		D 83 88 mN
TE	MPC	Subject Item EQT153	n ID No.			PACKAGE BC	JILEK (AB	(0)			Latitude	Latitude 30 degrees 30 min 35 se Longitude -91 degrees 11 min 10 se				
	Ph	d Discharge ysical cteristics	Diamete Stack Disc Area	harge He	ght of Stack pove Grade	Stack Exit Velocity	Stack Gas at Condition not at Stan	ons,   S	Stack Gas Temperati	ire   O	Normal perating Time lours per year)	Date of Constructio or Modification	n Percent Jan - Mar	This Emi:	Throughput ssion Point Jul - Sep	through Oct - Dec
	Change? 3.5 No N/A			60 ft	25 ft/sec	14,000	ft³/min	850 °				25%	25%	25%	25%	
		Type of Fuel Used and Heat Input (see instructions)										Parameters (include	units)			
Fuel		Type o			Heat Input							Parameter		Descrip Natural		
a		Natura	al Gas		5	0	Normal Ope					MMBTU/hr MMBTU/hr		Natural		
b							Maximum C		-	ougnpui	N/A		N/A			
С	L	Neto					Design Capacity/Volume N/A Shell Height (ft)									
Aı	Annual Emissions have been moved to Equipment Group GRP 0021.					Tank Diame										
	Emi	ssion Point II	D No.				Air Pol	lutant S	Specific	Inform	ation					
		(Alternate ID					Propos	ed Emis	sion Rates	3	Permitted	Add, Change,	Continuous			
		6-90		Control Equipmen Code	Control t Equipment Efficiency	HAP/TAP CAS Number	Average (lb/hr)	Maximi (lb/hr			Emission Rate (tons/yr)		Compliance Method	Concentration in Gas Stack		es Exiting at
		Pollutant								c						
		PM10		000		N/A 7446-09-5	*	1.27 0.58			2.63 1.20		**			
<u> </u>		SO <sub>2</sub> NOx		000		N/A	*	21.20			17.52	<del>C</del>				
├──		CO		000		630-08-0	*	18.76			38.76	c				
		VOC Total		000		N/A	*	2.97			6.13	C				
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# Appendix A Site Location Map



# Appendix B Emission Calculations

#### Sulfuric Acid Unit 1 (RLP 0014) and Unit 2 (RLP 0013)

**JBS** 12/13/2011

Nameplate Capacity, TPD (after debottlenecking):

Unit 1 Total

900

Unit 2 Total

1900 1200

Unit 2 Regen Furnace\* Unit 2 Sulfur Furnace\*

700

\*Estimated split for purpose of emission calcs only, these are NOT limits.

Operating Schedule:

8760 hours

**Emission Summary** 

	Unit 1 Maximum		Unit 2 Ma	Unit 2 Maximum		Unit 1 Annual <sup>6</sup>		Unit 2 Annuai <sup>6</sup>	
	ibs/hr	Ref	lbs/hr	Ref	tpy	Ref	tpy	Ref	
PM <sub>10</sub> (filterable + sulfuric acid mist)	11.25	1b	23.75	1b	16.43	1a	34.68	1a	
SO <sub>2</sub> -Phase II (current)	904.17	2a	NA	2b	3960.25	2a	762.85	2a	
SO <sub>2</sub> Phase III (after Unit 1 abated)	. NA	2b	NA	2b	312.08	2a	762.85	2a	
NOx	63.27	3b	134.56	3b	37.78	<i>3</i> a	54.20	3a	
CO	44.26	4b	74.61	4b	9.86	4a	41.37	4a	
Total VOC	0.94	5	2.73	5	3.44	5	9.95	5	
hydrogen chloride	14.87	9a	2.12	9a	2.48	8	1.11	8	
chlorine	0.21	9b	0.57	9b	0.45	8	1.25	8	
sulfuric acid	5.63	7b	11.88	7b	13.47	7a	28.43	. 7a	

#### References

1b

0.100 lbs/ton

Maximum hourly post-abatement overall PM10 (filterable + sulfuric acid mist) emission factor conservatively assumed to be:

0.300

lbs/ton

2a

1a

Unit 1 Phase II:

31.00 lbs SO<sub>2</sub> per ton acid produced

Annual/average post-abatement overall PM10 (filterable + sulfuric acid mist) emission factor conservatively assumed to be:

Unit 2:

2.20 lbs SO<sub>2</sub> per ton acid produced

700.00 TPD acid produced

1900.00 TPD acid produced

3960.25 TPY

762.85 TPY

904.17 lbs/hr SO<sub>2</sub>

Unit 1 Phase III:

1.90 lbs SO<sub>2</sub> per ton acid produced

900.00 TPD acid produced

312.08 TPY

#### References (cont.) SO<sub>2</sub> is regulated on a 3-hour average basis. 2b Emission factors calc'd from test data Unit 2: 0.23 lbs/ton, Regen furnace Unit 1: 0.23 lbs/ton 0.03 lbs/ton, Sulfur furnace 37.78 TPY 54.20 TPY Estimate as max result from Baytown facility (100 ppm): Estimate max hourly production as 120% of nameplate. To convert ppm to lbs/hr, use January 2002 stack test data, scaling up Unit 1: 452 ton per day acid during test Unit 2: 1191 ton per day acid during test 48.6 max ppm from Jan 2002 test 33.12 max ppm from Jan 2002 test 12.87 max lbs/hr from Jan 2002 test 23.28 max lbs/hr from Jan 2002 test 134.56 lbs/hr max 63.27 lbs/hr max Calculate emission factor based on January 2002 stack test: 452 ton per day acid during test 1191 ton per day acid during test Unit 2: Unit 1: 6.1 ppm max (Run 6) 15.19 ppm max (Run 3) 1.13 lbs/hr max (Run 6) 5.92 lbs/hr max (Run 3) 0.119 lbs/ton emission factor from testing 0.060 lbs/ton emission factor from testing 9.86 TPY 41.37 TPY Estimate as 100 ppm (RCRA limit) Estimate max hourly production as 120% of nameplate. 74.61 lbs/hr max Unit 1: 44.26 lbs/hr max Unit 2: Emission factors calc'd from test data (2003 Trial Burn, Table 9.9, Mode C) 5 Max emissions estimated as 120% of average. 0.0287 lbs/ton 0.0209 lbs/ton Unit 2: Unit 1:

Annual tpy is contribution to CAP-Comb or CAP-SAU

6

0.78 lbs/hr avg

0.94 lbs/hr max

3.44 TPY

2.27 lbs/hr avg 2.73 lbs/hr max

9.95 TPY

#### References (cont.)

For annual/average emissions, conservatively assume an overall emission factor for sulfuric acid mist of. This average/annual emission factor is for projected performance post-abatement. This factor is merely used to estimate total capped tpy emissions and is not intended to be a limit on its own. The only enforceable limit in terms of lbs/ton is the 0.15 lbs/ton limit per Subpart H.

0.082 lbs/ton

.

7b For maximum emissions, use NSPS Subpart H limit:

0.150

lbs/ton

8 See below (note these are internal allocations used to estimate total, they are not limits):

	Unit 1	Unit 2	Total Not	es/Reference
total chlorides fed, ibs/yr	900,000	2,500,000	(TS	+ Spent + IFS + sulfur + Daphne vent); conservative estimate
% of "chlorides fed" emitted as HCI	0.55%	0.089%	con	servative estimate based on test data
% of "chlorides fed" emitted as CI2	0.10%	0.10%	con	servative estimate based on test data
HCI emissions, lbs	4950	2225	7,175	
chlorine emissions, lbs	900	2500	3,400	

Estimate as 120% of max emission rates from November 2003 Trial Burn (all are Mode A, Run 2).

<sup>9</sup>b Estimate as twice the average rate b/c this is higher than 9a estimate.

### CAP-SAU -- Cap on Sulfuric Acid Unit Emissions (Unit 1 and Unit 2) For pollutants NOT included in Cap-Comb

JBS 11/15/2011

#### **EMISSION SUMMARY**

	Annı	Annual	
:	from Unit 1	from Unit 2	TPY
hydrogen chloride	2.48	1.11	3.59
chlorine	0.45	1.25	1.70
sulfuric acid	13.47	28.43	41.90
Metals - see "Metals" tab			

#### CAP-Comb -- Cap on Combustion Emissions [Unit 1, Unit 2, Rental (Holman) Boiler, Package (ABCO) Boiler]

For pollutants NOT included in CAP-SARU (CAP-Comb includes typical natural gas combustion pollutants)

JBS 11/15/2011

#### Description

Units 1 and 2 are the primary steam-generating units for the site. The Holman and ABCO boilers provide supplemental and backup steam. All 4 units work together to provide steam for the site and an emissions cap is appropriate for overall combustion emissions.

**Emission Summary** 

Linission outlinary						
	Annual tpy					Annual
:	from Unit 1	from Unit 2	from Holman	from ABCO	lbs/hr	TPY
PM <sub>10</sub> (filterable + sulfuric acid mist)	16.43	34.68	*	2.63	12.27	53.73
SO <sub>2</sub> Phase II (current)	3960.25	762.85	*	1.20	1078.61	4724.30
SO <sub>2</sub> -Phase III (after Unit 1 abated)	312.08	762.85	*	1.20	245.69	1076.13
NOx	37.78	54.20	*	17.52	25.00	109.50
СО	9.86	41.37	*	38.76	20.54	89.98
Total VOC	3.44	9.95	. *	6.13	4.46	19.52

#### Description

The TS vapor combustor is the backup VOC control device for emissions that normally vent to the Unit 2 Regen furnace which are (a) TS storage tank emissions, (b) emissions from venting direct burn railcars after pressure unloading, and (c) emissions from venting direct burn trucks after unloading (rarely). Permitted emissions are conservatively estimated assuming year-round venting to TSVC.

Natural Gas, Max Fire		
SCFM	183	1986 EIQ Sheet
BTU/SCF	1040	•
MMBTU/hr	11.4	
MMSCF/hr	0.011	
Vent Gas, Max:		
lbs/hr	10.6	maximum inlet VOC test result to date (1-15-02 Run 2)

21221 BTÚ/lb

0.225 MMBTU/hr. 11.6 TOTAL, MMBTU/hr, max

#### **EMISSION SUMMARY**

	AP-42 Factor	TCEQ Factor	John Zink Factor	Avera	ge	Maxim	Annual	
	lbs/MMSCF1	lbs/MMBTU <sup>2</sup>	lbs/MMBTU <sup>3</sup>	lbs/hr	Ref	lbs/hr	Ref	TPY
PM <sub>10</sub>	7.6			0.08	4	0.08	4	0.37
CO	84	0.5496		0.92	4	6.40	5	4.04
NOx			0.60	0.88	6	6.99	7	3.85
SO <sub>2</sub>				0.06	8	0.28	9	0.25
HCI				80.0	12	0.52	12	0.36
chlorine				0.004	12	0.03	12	0.02
Total VOCs				0.21	10	0.28	11	0.92

#### References

1. AP-42 Section 1.4, Natural Gas Combustion, 7/98, Factors for Small Boilers (<100 MMBtu/hr).

assume butane

- 2. From the TCEQ document —Air Permit Technical Guidance for Chemical Sources: Flares & Thermal Oxidizers RG-109 (Draft) September 2000, for low BTU streams (<1000 BTU/SCF)
- 3. Factor provided by John Zink "typical high" for vapor combustors.
- 4. AP-42 Factor and max natural gas firing rate.
- 5. TCEQ Factor and max MMBTU/hr (natural gas + vent).
- 6. Average of June 2010 and March 2011 test results.
- 7. John Zink Factor and max MMBTU/hr (natural gas + vent).
- 8. Maximum stack test result to date (from Sept 2009, while unloading a barge).
- 9. Estimate as 5X the average.
- 10. Average of 3 test runs in Jan 2002.
- 11. Maximum stack test result to date (from Jan 2002).

12. Estimate as follows:	VOCs vented, max lbs/hr (max of all data on combustor inlet)	10.60
	VOCs vented, avg lbs/hr (avg of all data on combustor inlet)	4.96
	% of VOCs vented that are chlorinated organics, max	5.0%
	% of VOCs vented that are chlorinated organics, average	1.7%
-	DRE of chlorinated organics	100%
	% converted to HCl	95%
	% converted to Cl2	5%

#### Description

The caustic scrubber (EIQ 13) and Acid Plant Vapor Combustor (APVC) operating in series are the backup control device for the spent acid storage tanks in the tankfarm (primary control device is Unit 1 furnace); other minor sources include the IFS Mix Tank, IFS railcar cleaning, and venting of railcars after they are pressure unloaded. The caustic scrubber provides SO<sub>2</sub> control and the APVC provides VOC control. As a backup to the Unit 1 furnace, the scrubber/APVC operate about 25% of the year. However, the pilot flame on the combustor is always lit. Thus, the operating schedule is shown as 52 weeks per year, but the majority of the emissions occur during 25% of the year.

Hours in Standby/Pilot:	6570	hours
Hours Controlling Emissions:	2190	hours
Natural Gas, Pilot		
SCFM	0.9	
MMSCF/hr	0,0001	•
Natural Gas, Assist Gas		
SCFM	55	
BTU/SCF	1040	
MMBTU/hr	3,43	
MMSCF/hr	0.003	
Vent Gas, Max:		
lbs/hr	152.88	max from Dec 2001 test
BTU/lb	21221	assume butane
MMBTU/hr	3.24	'
TOTAL MMBTU/hr when venting	6.68	
Overall avg MMBTU/hr	4.14	(weighted avg of pilot and venting time, for EIQ form)

#### **Emission Summary:**

	AP-42 Factor	John Zink Factor	Avg When Ve	enting (25%)	Avg in Pilot	(75%)	Overall Avg	Maxim	ıum	Annual
	lbs/MMSCF1	Ibs/MMBTU <sup>3</sup>	lbs/hr	Ref	lbs/hr	Ref	lbs/hr	lbs/hr	Ref	TPY
PM <sub>10</sub>	7,6		0.03	4a	0.00041	4b	0.01	0.03	4a	0.03
CO	84		6.74	6	0.00454	4b	1.69	15.13	8	7.40
NOx	100	0.60	1.16	6	0.00540	4b	0.29	4.01	7	1.29
SO <sub>2</sub>	0.6		0.04	8	0.00003	4b	0.01	0.40	9	0.04
HCI			0.35	12			0.09	2.24	12	0.39
chlorine			0.02	12			0.005	0.11	12	0.02
Total VOC	5.5		1.78	8	0.00030	4b	0.45	7.64	10	1.95

#### References

- 1. AP-42 Section 1.4, Natural Gas Combustion, 7/98, Factors for Small Boilers (<100 MMBtu/hr).
- 3. Factor provided by John Zink "typical high" for vapor combustors.
- 4a. AP-42 Factor and max natural gas firing rate.
- 4b. AP-42 Factor and pilot natural gas firing rate.
- 6. Average of June 2010 test results, 2 of the 4 runs were during barge unloading (max rates).
- 7. John Zink Factor and max MMBTU/hr (natural gas + vent).
- 8. Maximum stack test result to date (from Sept 2009, while unloading a barge).
- 9. Estimate as 10X the average rate when venting.
- 10. Apply 95% control to max uncontrolled VOC rate

12. Estimate as follows:	VOCs vented, max lbs/hr (max of all data on combustor inlet)	152.88
	VOCs vented, avg lbs/hr (avg of all data on combustor inlet)	72.59
	% of VQCs vented that are chlorinated organics, max	1.50%
	% of VOCs vented that are chlorinated organics, average	0.50%
	DRE of chlorinated organics	100%
	% converted to HCl	95%
	% converted to Ci2	5%

#### Package Boiler (ABCO) EIQ 6-90

JBS 11/15/2011

Op. Schedule =	8760	hrs per year
Average heat input =	50	MMBtu/hr
Maximum heat input =	106	MMBtu/hr
Heating Value of Natural Gas =	1040	BTU/scf
Molecular Weight of S =	32	lbs/lbmole
Molecular Weight of SO <sub>2</sub> =	64	lbs/lbmole

**Emission Summary** 

Pollutant	Basis	Sulfur Concentration (gr/100 scf)	Maximum Emissions (lbs/hr)	Annual Emissions <sup>5</sup> (tpy)
PM-10	-1		1.27	2.63
Sulfur Dioxide	2	2	. 0.58	1.20
Nitrogen Oxides	3,4		21.20	17.52
Carbon Monoxide	1		18.76	38.76
VOCs	1		2.97	6.13

#### Notes:

<sup>3</sup> Annual rate based on letter from the vendor G-P:

0.08

lb/MMBTU

<sup>4</sup> Maximum (assume on short-term basis, could be 2X the NSPS Db 30-day rolling average limit)
<sup>5</sup> Annual tpy is contribution to Cap-Comb

0.20

Ib/MMBTU

<sup>&</sup>lt;sup>1</sup> Max rate from the vendor, Gordon-Piatt Energy Group. Annual is max rate adjusted for firing rate.

<sup>&</sup>lt;sup>2</sup> Based on the assumption of total conversion of S to SO<sub>2</sub>

JBS 11/18/2011

#### Summary

Rhodia is area source for HAPs (<25 TPY total HAPs, <10 TPY each HAP)
Rhodia is major source for TAPs (>10 TPY for sulfuric acid)
Rhodia exceeds MERs (based upon proposed permitted annual emissions) for:

sulfuric acid HCl Cl2 MIBK antimony (and compounds)
arsenic (and compounds)
barium (and compounds)
chromium VI (and compounds)
copper (and compounds)
manganese (and compounds)
nickel (and compounds)
selenium (and compounds)

zinc (and compounds)

#### Total HAPs (compare to 25 tpy)

	Proposed Permit
Source - Pemitted HAPs	Limits (tpy)
Unit 1&2 (Cap-SAU) - HAP metals	0.404
Unit 1&2 (Cap-SAU) - HCl, Cl <sub>2</sub>	5.29
Sulfur Feed Tank- CS <sub>2</sub>	0.02
TS Vapor Combustor - HCl and Cl <sub>2</sub>	0.38
AP Vapor Combustor - HCl and Cl <sub>2</sub>	0.41
Gasoline Tank	0.06
TS Process - total TAPs	2.03
Spent Acid Process - total TAPs	0.59
CathyVal MIBK per V2 permit	9.46
CathyVal Other HAPs per V2 permit	5.07
CVAL GCXVII per V2 permit	0.34
Total Acid Plant	9.18
Total CVAL Plant	14.87
TOTAL Overall	24.05

Individual TAP/HAPs (compare to 10 tpy for HAPs) (compare to MERs for TAPs)

	Proposed Permit Limits (tpy) TAPs that are not HAPs							
Source	H <sub>2</sub> SO <sub>4</sub>	H₂S	barium (and compounds)	copper (and compounds)	zinc (and compounds)			
Unit 1&2 (Cap-SAU)	41.90		0.181	0.111	0.220			
Sulfur Feed Tank		0.44	-	-				
TS Vapor Combustor								
AP Vapor Combustor				:				
Gasoline Tank								
Fug-Acid	0.46			-				
Spent Acid Process		0.01			-			
TS Process		0.04			and .			
Acid Plant GCXVII	0.13							
CathyVal per V2 permit								
CVAL GCXVII per V2 permit								
TOTAL, tpy	42.49	0.49	0.18	0.11	0.22			
TOTAL, lbs/yr	84,985	980	362	222	440			
MER, lbs/yr	75	1000	37.5	25	200			

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process. These limits were intentionally calculated to equal 95% of the MER.

Individual TAP/HAPs (compare to 10 tpy for HAPs) (compare to MERs for TAPs)

		Proposed Permit Limits (tpy) TAPs/HAPs												
Source	нсі	Cl <sub>2</sub>	CS₂	antimony (and compounds)	arsenic (and compounds)	beryllium (and compounds)	cadmium (and compounds)	chromium VI (and compounds)	cobalt (and	lead compounds	manganese (and compounds)	mercury (and compounds)	nickel (and compounds)	selenium (and compounds)
Unit 1&2 (Cap-SAU)	3.59	1.70	-	0.032	0.022	0.012	0.012	0.030	0.03	0.08	0.080	0.012	0.038	0.056
Sulfur Feed Tank			0.02											
TS Vapor Combustor	0.36	0.02												
AP Vapor Combustor	0.39	. 0.02												-
Gasoline Tank						<u></u>				_				
Fug-Acid														
Spent Acid Process			-											
TS Process														
Acid Plant GCXVII			_											
CathyVal per V2 permit														
CVAL GCXVII per V2 permit				<del>-</del>		<u> </u>	<del></del>							
TOTAL, tpy	4.34	1.74	0.02	0.03	0.02	0.01	0.01	0.03	0.03	0.08	0.08	0.01	0.04	0.06
TOTAL, lbs/yr	8,680	3,480	40	64	44	24	24	60	60	160	160	24	76	112
MER, Ibs/yr	500	100	2400	37.5	25	25	25	25	sup	sup	75	25	25	25

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process. These limits were intentionally calculated to equal 95% of the MER.

Individual TAP/HAPs (compare to 10 tpy for HAPs) (compare to MERs for TAPs)

						Proposed P	Permit Lim	its (fnv)					
		Proposed Permit Limits (tpy) TAPs/HAPs											
Source	MIBK	methanol	chloroethane	methyl chloride	phenol	hydroquinone	pyro- catechol	n-hexane	benzene	toluene	2,2,4- trimethyl pentane	ethyl- benzene	xylenes
Unit 1&2 (Cap-SAU)				_									
Sulfur Feed Tank		an.									_		
TS Vapor Combustor		1	· <u>-</u>							-			
AP Vapor Combustor													
Gasoline Tank								0.01	0.01	0.01	0.01	0.01	0.01
Fug-Acid				_									
Spent Acid Process	0.01	0.50	0.50	0.39	0.01	0.50	0.50	0.50	0.01	0.50	0.50	0.50	0.50
TS Process	0.01	0.50	0.50	0.50	0.10	0.50	0.50	0.50	0.10	0.50	0.50	0.50	0.50
Acid Plant GCXVII		-											
CathyVal per V2 permit	9.46	3.38	0.12	0.23	0.52	0.36	0.46						
CVAL GCXVII per V2 permit	0.04	0.04	0.04	0.04	0.06	0.05	0.07			-			
TOTAL, tpy	9.48	4.38	1.12	1,12	0.63	1.36	1.46	1.01	0.12	1.01	1.01	1.01	1.01
TOTAL, lbs/yr	18,960	8,760	2,240	2,240	1,260	2,720	2,920	2,020	240	2,020	2,020	2,020	2,020
MER, lbs/yr	15,000	20,000	20,000	7750	1400	NA - sup	NA - sup	13,000	260	20,000	NA - sup	20,000	20,000

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process. These limits were intentionally calculated to equal 95% of the MER.

#### Appendix C

#### LA MACT Standards

MACT is required for Class I and II TAPs that are permitted site-wide above their respective minimum emission rates (MERs). The application does not propose to change any emission rates of class I or II TAPs, thus no new MACT determinations are needed. Additionally, there is no change to the existing MACT determinations with this permit application.

#### LA Ambient Air Standards

This permit application proposes to modify emission rates for the Class III TAPs hydrochloric acid and chlorine. See below for a comparison of previously modeled emissions and results along with current and proposed emission rates.

EIQ ID	EQT ID	Source	Modeled	Permitted Max lbs/hr	Ambient Air Standard	Model Result	
			lbs/hr		(µg/m3)	$(\mu g/m3)^1$	
8818-046			Chl	orine			
3	RLP	Unit No. 1		0.20 (V3)			
	0014		0.2103	0.21 (V4 prop)			
2	RLP	Unit No. 2	0.2105	0.05 (V3)		1	
	0013			0.57 (V4 prop)		26.71	
21	EQT	TS Vapor	0.5063	0.10 (V3)	35.7	20171	
	0147	Combustor	0.5065	0.03 (V4 prop)			
27	EQT	Acid Plant Vapor	0.5492	0.54 (V3)			
	0151	Combustor	0.5492	0.11 (V4 prop)			
Hard Land Colored September 1			Hydroch	loric Acid			
3	RLP	Unit No. 1		14.87 (V3)			
	0014		14.1587	14.87 (V4 prop)			
2	RLP	Unit No. 2	14,1367	2.12 (V3)			
	0013			2.12 (V4 prop)	180	134.82	
21	EQT	TS Vapor	0.5206	0.42 (V3)	160	154.02	
	0147	Combustor	0.3200	0.52 (V4 prop)	]		
27	EQT	Acid Plant Vapor	2.9762	2.20 (V3)			
	0151	Combustor	2.9702	2.24 (V4 prop)			

"V3" is the max hourly rate in the current permit (number 0840-00033-V3 issued 5-11-11). "V4" is the proposed rate per this permit application. Modeling was conducted (Providence, March 2005) for the initial Title V permit (number 0840-00033-V0). As shown above, emission rates have been revised/reconciled between the time of the March 2005 modeling and the current/proposed permit. These revisions are not expected to negatively impact the results because the vapor combustors have a disproportionately higher impact on predicted offsite concentrations (due to lower stack heights and velocities) than Units No. 1 and No. 2 and the vapor combustors proposed permitted emission rates are less than or equal to the modeled emissions. Rhodia will update the modeling to validate this supposition and forward the results to LDEQ upon request.

<sup>&</sup>lt;sup>1</sup> Refined modeling for year 2003, includes offsite sources.

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BOBBY JINDAL GOVERNOR



PEGGY M. HATCH SECRETARY

#### State of Louisiana

# DEPARTMENT OF ENVIRONMENTAL QUALITY FNIVIRONMENTAL SERVICES

Certified Mail No.: 7006 0810 0003 0354 7105

Activity No.: 20100009 Agency Interest No. 1314

Mr. Daniel Tate Plant Manager Rhodia, Inc. P.O. Box 828

Baton Rouge, Louisiana 70821-0828

Rouge Parish, Louisiana

Dear Mr. Tate:

RE:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

Part 70 Permit Modification, Rhodia, Inc. - Sulfuric Acid Plant - Baton Rouge Facility, Baton Rouge, East Baton

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_\_\_\_\_, 2016, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and Agency Interest No. cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Permit No.: 0840-00033-V3

Sincerely,

Sam L. Phillips Assistant Secretary

SLP:dhb

c: US EPA Region VN

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Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc. Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

#### I. Background

Rhodia Inc. (Rhodia) operates a Sulfuric Acid Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces sulfuric acid by using two sulfuric acid production trains (Unit No. 1 and Unit No. 2). Unit No. 1 was constructed in 1953 and unit No. 2 was constructed in 1968. Previously the facility operated under Title V Permit 0840-00032-V0 dated October 12, 2005 and Title V General Permit No. 3032-V1 issued December 13, 2006. Currently the facility operates under a consolidated Title V Permit 0840-00032-V2 dated November 30, 2009.

Rhodia has entered into a Consent Decree (Civil Action No. 2:07CV134 WL) with the United States and various State parties including Louisiana, effective July 23, 2007. This Consent Decree requires Rhodia to install controls for SO<sub>2</sub> emissions at their various plant sites nation wide. The requirements for the Baton Rouge Facility have been incorporated into this permit.

#### II. Origin

An air permit application and Emission Inventory Questionnaire (EIQs) were submitted by Rhodia, Inc. on September 16, 2010 requesting a Part 70 operating permit major modification.

#### III. Description

#### Sulfuric Acid Plant

Rhodia receives spent sulfuric acid and hazardous waste fuels from off-site sources and recovers the sulfur and energy values in its industrial furnaces, forming fresh sulfuric acid. The sulfuric acid production process begins with treatment of the feed streams in the industrial furnace. Liquids are sprayed using atomizers into the combustion chamber. Normal operating conditions are 2% to 4% excess furnace oxygen and furnace temperature between 1800°F and 2200°F at the furnace discharge. Furnace residence time is approximately three seconds. The feed streams are producing steam for process use. Gas from the waste heat boiler is further cooled and cleaned in the gas scrubbing system. This system includes spray scrubbing and wet electrostatic precipitators to remove acid mist and particulate emissions.

Cooling systems reduce the gas temperature from 600°F to 100°F. The wet gas is then dried through counter-current packed flow columns circulating ≥93% sulfuric acid. Dry gas is heated to 800°F before the sulfur dioxide is converted to sulfur trioxide using catalyst. Because the conversion step to sulfur trioxide is exothermic, the hot exhaust gas is used to heat up the incoming feed by cross-current heat exchange.

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Sulfur trioxide from the converter enters a countercurrent packed absorption tower. Strong sulfuric acid absorbs and hydrolyzes the sulfur trioxide to sulfuric acid. The demisters are the final pollution control device, removing primarily sulfuric acid mist generated in the acid tower. The demisters also control HCl and particulate emissions.

The preceding process description pertains to Unit No. 1. The Unit No. 2 process is slightly different. After the drying step, the gas enters a second sulfur burning furnace, followed by a hot gas filter. This added step heats the gas, affording a second occasion for combustion. Unit No. 2 has over twice the capacity of Unit No. 1. Equipment is sized proportionately, with Unit No. 2 having a longer residence time.

#### Waste Storage

Seven tanks have been constructed specifically for the storage of hazardous waste. These seven tanks are located in the truck and rail unloading facility and operate under a nitrogen pad. A positive pressure vent system is tied into Unit No. 2 or to the TS Vapor Combustor to burn all fumes and vapors.

#### Package Boiler

The package boiler provides backup and supplemental steam production to Units No. 1 and No. 2. It is rated for 80,000 lbs/hr steam production with a heat input of 106 MMBtu/hr and is permitted for an annual average heat input of 50 MMBtu/hr. It is fired with natural gas only and is equipped with low-NOx burners and a continuous flue gas oxygen analyzer.

#### Rental Boiler

The rental boiler provides backup steam production to Units No. 1 and No. 2 and the package boiler. It is fired with natural gas only and has a maximum firing rate of 133 MMBtu/hr but is limited to a calendar average firing rate of 12.4 MMBtu/hr per 40 CFR 60.44b(j)(2).

#### SO<sub>2</sub> Abatement Scrubbers and Debottlenecking Project

As part of Rhodia's consent decree for the Baton Rouge facility, Rhodia will install packed bed scrubbers on Sulfuric Acid Unit No. 1 and Unit No. 2 to control SO<sub>2</sub> emissions, which will be reduced by more than 10,000 TPY by the completion of Phase III of the project. Also as part of the consent decree, the Environmental Protection Agency (EPA) agreed to allow the Sulfuric Acid Plant to undergo an expansion project. This project will allow the facility to increase its total Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) production from 2,200 tons/day to 2,800 tons/day. Specifically, the capacity of Sulfuric Acid Unit No.1 (EPN 3) will increase from 700 tons/day to 900 tons/day of sulfuric acid, and the capacity of Sulfuric Acid Unit No. 2 (EPN 2) will increase from 1,500

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tons/day to 1,900 tons/day. The capacity increase will be accomplished with a series of debottlenecking projects.

#### Proposed Changes

Rhodia is requesting the following changes with this permit modification.

- 1. Reinstate the 10% annual capacity limit for the Rental (Holman) Boiler (EQT0186). While the Package Boiler (EQT0153) was out for repairs in March 2010 September 2010, the Rental Boiler was used for supplying backup steam production for Unit 2, which required the Rental Boiler to exceed the 10% annual capacity limit. Now that the ABCO boiler is back in service, the Rental Boiler will resume running at the 10% annual capacity factor.
- 2. Remove three LAC 33:III.501.C.6 requirements for the Rental (Holman) Boiler (EQT0186) because the requirements are already covered by 40 CFR 60 Subpart Db or LAC 33:III.509.R.6.
- 3. Modify the applicable NSPS Subpart Db requirements for the Package (ABCO) Boiler (EQT0153) to address the addition of a NO<sub>x</sub> analyzer. The requirements will go into effect once the NO<sub>x</sub> analyzer is installed.
- 4. Revise the maximum lbs/hr limit for NO<sub>x</sub> on the Package (ABCO) Boiler (EQT0153) to allow for normal variation in short-term emissions.
- 5. Reconcile emissions of PM<sub>10</sub> from the cooling towers (EQT0154 & EQT0155) using an accurate measurement of total dissolved solids (TDS) and an updated drift factor. In the previous permit, a measurement of total suspended solids (TSS) was mistaken for TDS by Rhodia's in-house lab. Rhodia also changed the drift factor used in the PM<sub>10</sub> emission calculations from the AP-42 factor to one provided by the vendor.
- 6. Reconcile emissions from the gasoline tank (EQT152) using updated input parameters in the TANKS 4.09 program.
- 7. Add the Diesel Fire Water Pump 20G961 (EQT291) along with 40 CFR 63 Subpart ZZZZ requirements for the engine.
- 8. Update the General Condition XVII Activities and the Insignificant Activities.
- 9. Replace the specific requirement for weekly pump inspections in the Treatments Services Fugitive Emissions (FUG0003) with the appropriate requirement for dual-mechanical seal pumps.
- 10. Update the UTM coordinates for the Treatment Services Sumps (ARE0003).
- 11. Replace LAC 33:III.Chapter 15 requirements for RLP0013 & RLP0014 with 40 CFR 60 Subpart H requirements in order to incorporate the Consent Decree signed by the EPA and LDEQ on July 23, 2007.

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Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
$PM_{10}$	54.52 <sup>*</sup>	58.16*	+3.64
SO <sub>2</sub> (Phase II)	4725.98	4726.08	+0.10
SO <sub>2</sub> (Phase III)	1077.79	1077.89	+0.10
$NO_x$	115.58	117.13	+1.55
CO	95.43	95.76	+0.33
VOC	26.16	26.55	+0.39

Includes sulfuric acid mist

Phase II is effective from January 1, 2011 through April 30, 2012.

Phase III becomes effective on May 1, 2012.

Total HAP emissions are capped under 8.92 TPY.

For a list of VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs) and its respective emission rates in tons per year see the TPOR0146 report – Emission Rates For TAP/HAP & Other Pollutants.

#### IV. Type Of Review

This application was reviewed for compliance with the Louisiana Part 70 operating permit program, Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) do not apply.

This facility is a major source of criteria pollutants. The facility is also a major source of Toxic Air Pollutants (TAPs) under LAC 33:III. Chapter 51. The facility is not a major source of Hazardous Air pollutants (HAPs); however, wastewater and wastewater residuals from facilities subject to 40 CFR 63 Subpart G and other MACT standards or NSPS may be treated at the facility. Therefore, the Sulfuric Acid Plant complies with any applicable provisions of these MACT/NSPS standards.

The modification is significant and requires LDEQ and EPA review. The starting date of the five-year permit duration is being established as per LAC 33:III.507.E.2.

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#### **Permit Shield**

Per 40 CFR 70.6(f) and LAC 33:III.507.I, a permit shield has been determined for the referenced facility as follows:

- 1. Per 40 CFR 60.8(c), emissions in excess of a standard are not in violation during startup, shutdown, or malfunction events. Further, per 40 CFR 60.11(c), the opacity standards do not apply during periods of startup, shutdown, and malfunction. Rhodia's Consent Decree defines startup as, "the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oils, to the furnace commences after a main gas blower shutdown" but there is no such definition in 40 CFR 60 Subpart H. Therefore, Rhodia has requested a permit shield to use the Consent Decree definition of "startup" for determining compliance with the 40 CFR 60 Subpart H 10% opacity limit and the 0.15 lbs/ton limit.
- 2. The Unit No. 1 and Unit No. 2 furnaces are treatment processes for certain waste streams regulated under 40 CFR 61 Subpart FF (Benzene Waste NESHAP). Per 40 CFR 61.348(e) certain requirements apply if the treatment process has any openings (e.g., access doors, hatches, etc.)

The furnaces operate at less than atmospheric pressure which is continuously monitored. Annual inspections per 61.348(e)(3)(ii) are conducted. Frequent inspections and repairs are conducted to minimize any cracks and unsealed openings. Very small openings may go undetected and/or not be repaired because the furnaces operate under vacuum. Occasionally, the furnaces may experience a short-term positive pressure when introducing a new feed to the furnace. This issue was reviewed with LDEQ for the recently issued BIF permit. The BIF permit requires that furnace pressure be maintained at -0.1 inches of water maximum, 10-second delay. The 10-second delay is allowed to normalize the pressure before automatically shutting down feeds to the furnace.

Rhodia requested a permit shield that allows compliance with 61.348(e) to be demonstrated by maintaining furnace pressure at -0.1 inches of water maximum, 10-second delay and operating furnace openings with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h).

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- 3. For the Treatment Services Fugitive Emissions (EIQ FUG-TS), per the Louisiana Fugitive Emissions Program Consolidation Guidelines, Rhodia follows a streamlined fugitive monitoring program with the Louisiana MACT Determination for Non-HON sources as the most stringent program. Rhodia has reduced site-wide permitted emissions of all class I and II TAPs emitted from source FUG-TS to below their MERs. Thus, LA Non-HON MACT no longer applies. However, Rhodia is voluntarily choosing to continue to comply with the LA Non-HON MACT since the program is already in place. Therefore, Rhodia is requesting a permit shield to ensure that voluntarily complying with LA Non-HON MACT still ensures compliance with the underlying programs that were consolidated (40 CFR 264 Subpart BB and 40 CFR 61 Subpart V).
- 4. Rhodia requested a permit shield stating that compliance with the NSPS Subpart H acid mist and opacity standards constitutes compliance with the LAC 33:III.Chapter 15 acid mist standard and the LAC 33:III.1311.C opacity standard and that compliance with the SO<sub>2</sub> standard in the permit (long-term and short-term limits which are lower than the Subpart H standard of 4.0 lbs/ton) constitutes compliance with the LAC 33:III.Chapter 15 SO<sub>2</sub> standard. "Standard" in this context includes all monitoring, recordkeeping, reporting, and testing. This permit shield is effective upon permit issuance for Unit 2 for all three pollutants and for Unit 1 for acid mist. It becomes effective for Unit 1 SO<sub>2</sub> and opacity when the more stringent standards become effective on May 1, 2012

#### V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

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#### VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on March 23, 2011. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on March 21, 2011. The draft permit was also submitted to US EPA Region VI on March 23, 2011. No comments were received.

#### VII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the LDEQ Air Permits Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions for this permit modification. However, LDEQ did require modeling for the 0840-00033-V2 permit, which the facility submitted on October 6, 2008. The results are presented below.

Dispersion Model(s) Used: <u>ISCT3</u>

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Chlorine	8-Hour	26.71 μg/m <sup>3</sup>	35.7 μg/m <sup>3</sup>
Hydrochloric acid	8-Hour	134.82 μg/m³	180.0 μg/m <sup>3</sup>
Sulfuric acid	8-Hour	22.32 μg/m <sup>3*</sup>	23.8 μg/m <sup>3</sup>
MIBK	8-Hour	323.02 μg/m³	4880 μg/m <sup>3</sup>
Antimony	8-Hour	0.466 μg/m³	11.90 μg/m³
Arsenic	Annual	0.00004 μg/m <sup>3</sup>	$0.02  \mu \text{g/m}^3$
Barium	8-Hour	$0.884  \mu \text{g/m}^3$	11.90 μg/m <sup>3</sup>
Chromium VI	Annual	0.00004 μg/m³	$0.01  \mu \text{g/m}^3$
Copper	8-Hour	0.40913 μg/m <sup>3</sup>	$23.80  \mu g/m^3$
Manganese	8-Hour	0.27827 μg/m <sup>3</sup>	4.76 μg/m <sup>3</sup>
Nickel	Annual	0.00004 μg/m <sup>3</sup>	0.21 μg/m <sup>3</sup>
Selenium	8-Hour	$0.35001  \mu g/m^3$	4.76 μg/m³ ੍
Zinc	8-Hour	0.80561 μg/m <sup>3</sup>	119.00 μg/m³

### Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc.

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Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard
	·.		{NAAQS})
SO <sub>2</sub> *	Annual	21.88 μg/m <sup>3</sup>	(80 μg/m <sup>3</sup> )
	24-Hour	$335.04  \mu \text{g/m}^3$	$(365  \mu g/m^3)$
	3-Hour	1017.57 μg/m <sup>3</sup>	$(1300  \mu g/m^3)$
*Phase I emissions (worst cas	e)		

#### VIII. General Condition XVII

		Emission Rates – tons						
ID No.	Work Activity	Schedule	$PM_{10}$	$SO_2$	$NO_X$	CO	VOC	Other
GC1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 24 months per unit	0.2	, , , , ,				· ·
GC2	Drum re-packaging	4 times per year					0.002	
GC3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly					0.06	
GC4	Tank and process equipment cleaning						0.90	
GC5	Opening of truck and railcars containing waste fuel and spend acid for sampling, inspection, maintenance, or further processing	Daily			at nt.	÷	0.02	
GC6	Sampling waste fuel trucks and railcars via sample tap	10 times per day					. 0.01	##
GC7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day				1	0.004	
GC8	Washing inside surface of Unit No. 1 & 2 exhaust stacks	4 each Unit/Υτ			1.33		-	0.03*
GC9	Odor-neutralizing compounds						0.06	
GC10	Manual gauging of tank levels						0.002	
GC11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (formerly EIQ 18)			<0.001				<0.001*

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		•		Emissi	on Rates	– tons		
ID No.	Work Activity	Schedule	$PM_{10}$	$SO_2$	. NO <sub>X</sub>	CO	VOC	Other
	Sampling for moisture content,							
GC12	stack gauging, and pressure			0.1				0.1*
	readings from gas streams							
GC13	Loading fresh acid onto heel of			0.003			0.004	
0013	spent acid	*****						
GC14	Acid Plant Vapor Combustor	96 hours per					3.25	**
GC14	(APVC) routine maintenance	year (max)						
	Unloading containers of spent acid							
GC15	with small percentage of chlorinated	1 per week		0.50			0.06	**
	VOCs							
	*Sulfuric Acid Mist							
	#Hydrogen Sulfide	n						
	**VOC Speciation similar to Spent Acid ##VOC Speciation similar to TS Process		ssions					

#### IX. Insignificant Activities

ID No.	Description	Operating Rate (Max) or Tank Capacity	Regulation
20D962	Diesel Storage Tank, Firewater Pump	300 gal	LAC 33:III.501.B.5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gal	LAC 33:III.501.B.5.A.3
	Diesel Storage Tank, IFS	1000 gal	LAC 33:III.501.B.5.A.3
91D321	IFS Wash-water Storage Tank	9000 gal	LAC 33:III.501.B.5.A.3
90D210	Laboratory Excess Sample Tank	100 gal	LAC 33:III.501.B.5.A.2
Hoods	Different Analyses*	N/A	LAC 33:III.501.B.5.A.6
	Drum Washing Operations	55 gal	LAC 33:III.501.B.5.A.7

<sup>\*</sup>Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environmental monitoring purposes.

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X. /	Applicable Louisiana and Fedo	eral A	Air Ç	)uali	ity F	Requ	ireme	nts									<del></del>		-	
ID	Description									LA	AC 33:	III.Ch	apter							
No.:	Description	5 <sup>*</sup>	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
UNF002	Facility Wide	1	1	1			<del> </del>				<del> </del>	1 1	1	<u> </u>	<del>                                     </del>	1	<del> </del>	1	<u> </u>	<del>                                     </del>
ARE002	M4 – West End Sump	1		1		† <del></del>			<b>-</b>	<del></del>					<del>                                     </del>			<u> </u>	1 1	
ARE003	M3 - Treatment Services Sumps	"	†					<del> </del>						·					<del>  </del>	<del></del>
EQT008	30D260 - Spent Acid Tank	<u> </u>	1			<del></del>		2	· · · · · · · · · · · · · · · · · · ·	-								-	╁┈──	<del> </del>
EQT140	10 - Preheater; Acid Unit No. 1			1	1	2								<del></del>	1	<del></del>	<del> </del>	<del>                                     </del>	<del>                                     </del>	<del> </del>
EQT141	11 – Lime Silos				1	<u> </u>				·					<del> </del>		<del>                                     </del>		<del> </del>	<del> </del>
EQT142	12 - Oleum Loading Vent Scrubber	1	<u> </u>	<u> </u>			<u> </u>	<del></del>	<del>                                     </del>					<u> </u>		<del> </del> -	-	1	<del> </del>	<del></del>
EQT146	20 - Sulfur Feed Tank		<u> </u>			2						<del> </del>						<u> </u>	<u> </u>	<del> </del>
EQT147	21 - TS Vapor Combustor			1	1	2		1							<del>                                     </del>	-		1	<del>                                     </del>	1-
EQT149	24 - Oleum Barge Loading Scrubber	1	-									<del>                                     </del>	·		<del> </del>		<del></del>	1	<del> </del>	├──
EQT150	26 - Spent Acid Barge Loading Scrubber	1								3			2					<u> </u>		-
EQT151	27 - Acid Plant Vapor Combustor	<b> </b>		1	1	2		2							-			1	ļ	<u> </u>
EQT152	28 - Gasoline Storage Tank	T						1	<del></del>						<del>                                     </del>				ļ	<del> </del>
EQT153	6-90 Package Boiler			ī	1	2													<del>                                     </del>	<del>                                     </del>
EQT154	Mla - Unit 2 Cooling Tower			<u> </u>	2			<u> </u>							<del></del>	<u> </u>				<del>                                     </del>
EQT155	Mlb - Unit I Cooling Tower				2					***		-							-	
EQT285	20D380 - Unit 2 Weak Acid Tank	1	<u> </u>										;					· -		<del></del>
EQT157	30D030 - Oleum Tank										•	<u> </u>	•••		1	<del></del>				<del></del>
EQT158	30D040 – 93/Oleum						***					<del> </del>							-	
EQT159	30D050 – 99WW Tank											<del></del>								<del></del>
EQT161	30D070 - Spent Acid Tank	T		<u> </u>				2									<u> </u>			
EQT163	30D100 - Spent Acid Tank	T		<u>                                     </u>				2											-	<del> </del>
EQT164	30D110 - Spent Acid Tank							2							<del> </del>			· · · ·		<u> </u>
EQT165	30D120 - Spent Acid Tank	T	-					2			-								<u> </u>	<del></del>
EQT166	30D130 - Oleum Tank	·																		<del> </del>

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X. /	Applicable Louisiana and Fede	ral A	ir Q	uali	ty R	equ	ireme	nts												
ID	Description									LA	AC 33:	III.Ch	apter							
No.:	Description	5▲	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT167	30D140 - 99/Oleum/Spent					1		2							<del></del>					
EQT168	30D150 - 99/Oleum Spent							2												
EQT169	30D160 - Spent Acid Tank							2							1					
EQT170	30D180 - 93E Tank	,										İ								1
EQT171	30D190 - Spent Acid Tank							2				-	<del>                                     </del>		<del> </del>		<del>                                     </del>			
EQT173	30D210 – 93E Tank						1													
EQT174	30D220 99WW Tank																			
EQT175	30D230 - 99C Tank																			
EQT176	20D120/30D240 - IFS Mix Tank				<u> </u>			1												
EQT177	40D250 - Treatment Services Tank							1						<u> </u>						
EQT178	40D280 - Treatment Services Tank							1												
EQT179	40D290 - Treatment Services Tank							1												
EQT180	40D200 - Treatment Services Tank			<u> </u>				1												
EQT181	40D210 - Treatment Services Tank							1												
EQT182	40D300 - Treatment Services Tank							i												
EQT183	40D220 - Treatment Services Tank							1												
EQT184	30D103 - Sulfur Unloading Tank				I															
EQT185	M7 - 001 Wastewater Treatment Unit															T	1			1
EQT186	1-06 - Rental Boiler	1		1	1	2														1
FUG002	FUG-ACID – Acid Plant Fugitive Emissions					2									3			1		
FUG003	FUG-TS – Treatment Services Fugitive Emissions														3			1		
GRP002	CAP-SAU – Sulfuric Acid Units 1 & 2	1															<u> </u>		1	
GRP021	CAP-Comb - Combustion (Unit 1, Unit 2, Rental Boiler)	1																		
RLP013	2 – Sulfuric Acid Unit No. 2	1			1	1												1		
RLP014	3 – Sulfuric Acid Unit No. 1	1			1	1												1		

### Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc.

Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

ID	Dogometica									LA	AC 33:	III.Ch	apter							
No.:	Description	5 👗	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
PCS001	Spt-Proc - Spent Acid Process		1	<del>†                                     </del>						1		<del> </del>		<u>                                     </u>	-	<u> </u>		<u>                                     </u>	<u> </u>	+
PCS002	TS-Proc - TS Process		<del>                                     </del>	1				<u> </u>		<del>                                     </del>	l —	<del> </del>		· ·	<del> </del>			1	+	+
EQT277	13 - Acid Plant Caustic Scrubber		1			1				<del></del>				-	<del> </del>		-	1		+
EQT278	U1-Scbr - Unit 1 Tail Gas Scrubber		1.1	<del> </del> -			l				<del>                                     </del>		<del></del>	<del> </del>	-	<del> </del>		-	<del> </del>	+
EQT279	U2-Scbr - Unit 2 Tail Gas Scrubber		T i	1		ļ <u></u>	<del></del>		***	<del></del>	-	<del> </del>		<del> </del>	-	-			<del> </del>	
EQT280	U1-Furn – Unit 1 Furnace	<del> </del>		ī		<del>                                     </del>		2				-				<del> </del>		1	<del> </del>	
EQT281	U2-RFurn – Unit 2 Regen Furnace		<b>†</b>	1				1			<u> </u>						-		<del> </del>	+
EQT282	U2-SFum - Unit 2 Sulfur Fumace	_	1-	1				<u> </u>				<del></del>					-		<u> </u>	+
EQT283	U1-Proc - Unit 1 Process	<del> </del>		<del>                                     </del>		1						<b></b>	-						<del> </del>	<del></del>
EQT284	U2-Proc - Unit 2 Process	1				1					<del> </del>		<del> </del>	<del>                                     </del>	<del> </del>	<del>                                     </del>		1	-	+
EQT291	M10 - Diesel Fire-water Pump	+	<del>                                     </del>	1	1	<del></del>	<del>                                     </del>					-			<del> </del>			<u> </u>	-	<del> </del>

<sup>\*</sup> The regulations indicated above are State Only regulations.

#### **KEY TO MATRIX**

- 1 -The regulations have applicable requirements that apply to this particular emission source.
  - -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source. Blank The regulations clearly do not apply to this type of emission source.

All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

### Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc.

Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

X. A <sub>l</sub>	pplicable Louisiana and Fed	ler	al A	ir Ç	uali	ity	Req	uire	me	nts							,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,												
ID No.:	Description			40	CFR	60				40	CFR	61		<u> </u>			4	0 CF	R 63				4	0 CF 65	R		40 CF	R	40 CFR 264
		Α	Cd	Db	H	$\overline{\mathbf{K}}$	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	Α	C	G	64	68	82	BB
UNF002	Facility Wide	1							1		1		1	1	3			1	1		1						1	1	
ARE002	M4 - West End Sump																				L								
ARE003	M3 - Treatment Services Sumps																												
EQT008	30D260 - Spent Acid Tank							1																1	1				
EQT140	10 - Preheater; Acid Unit No. 1																												
EQT141	11 - Lime Silos		I																										
EQT142	12 - Oleum Loading Vent Scrubber													i															
EQT146	20 - Sulfur Feed Tank		1						1				ĺ																
EQT147	21 - TS Vapor Combustor							i					1					1		T									
EQT149	24 - Oleum Barge Loading Scrubber		-																									<u>l</u>	
EQT150	26   Spent Acid Barge Loading Scrubber																												
EQT151	27 - Acid Plant Vapor Combustor																						1		1				
EQT152	28 - Gasoline Storage Tank							3					L.,						<u></u>						<u> </u>	ļ			
EQT153	6-90 – Package Boiler			1																					<u> </u>	<u> </u>			
EQT154	Mla – Unit 2 Cooling Tower												<u> </u>	<u> </u>						3				<u> </u>	ļ	<u> </u>			
EQT155	MIb - Unit I Cooling Tower									<u> </u>					<u></u>	<u></u>				3	<u> </u>					<u> </u>			
EQT285	20D380 - Unit 2 Weak Acid Tank					3	3	3			<u> </u>			<u> </u>			1			_				<u> </u>	<u> </u>				
EQT157	30D030 Oleum Tank	<u> </u>				3	_ 3	3													ļ	<u> </u>		<u> </u>	ļ	ļ			
EQT158	30D040 – 93/Oleum		1			3	3	3					<u> </u>	<u>                                      </u>				<u></u>					ļ	ļ		_			
EQT159	30D050 – 99WW Tank			<u> </u>		3	3	3	<u> </u>	<u> </u>										<u> </u>	<u> </u>	ļ		Ļ	ļ				
EQT161	30D070 - Spent Acid Tank					3	3	1															ļ	1	1		<u> </u>		<u> </u>
EQT163	30D100 - Spent Acid Tank				<u> </u>	3	3	1			<u> </u>	ļ		1	<u> </u>		ļ							1	1			<u> </u>	
EQT164	30D110 - Spent Acid Tank					3	3	1		<u> </u>	<u> </u>									_				1	1				
EQT165	30D120 - Spent Acid Tank					3	3	1																1	1	_	<u> </u>		
EQT166	30D130 - Oleum Tank					3	3	3													<u> </u>				<u> </u>				
EQT167	30D140 - 99/Oleum/Spent					3	3	ī														<u> </u>		1	1	<u></u>	<u> </u>		

### **Sulfuric Acid Plant - Baton Rouge Facility**

Rhodia, Inc.
Agency Interest No.: 1314; PER20100009
Baton Rouge, East Baton Rouge Parish, Louisiana

X. A	pplicable Louisiana and Fed	der	al A	ir (	Qual	ity	Rec	luir	eme	nts									<u> </u>							<del></del>	<u>. , , , , , , , , , , , , , , , , , , ,</u>		
ID No.:	Description		r		CFR						CFR								R 63				İ	0 CI 65			40 CF	R	40 CFR 264
E 0 E 1 6 0		A	Cd	Db	H		Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	С	G	64	68	82	BB
EQT168	30D150 – 99/Oleum Spent			<u> </u>	<u></u>	3	3	11																}	1				
EQT169.	30D160 - Spent Acid Tank		<u> </u>			3	3	1							·									1	Ħ			1	···
EQT170	30D180 – 93E Tank		ļ			3	3	3					Ī							1			1	<u> </u>		<del>                                     </del>	-	<del> </del>	<del> </del>
EQT171	30D190 - Spent Acid Tank			<u> </u>		3	3	1		1						T			-	1				1	1		<del>                                     </del>	<del> </del>	<del> </del>
EQT173	30D210 – 93E Tank			<u></u>		3	3	3					"			, · · ·			· · · · · · · · · · · · · · · · · · ·	<del> </del>				•	<u> </u>			<del></del>	
EQT174	30D220 – 99WW Tank					3	3	3															-					<del> </del>	
EQT175	30D230 – 99C Tank			L		3	3	3											-	<del>                                     </del>			-		-			<del>                                     </del>	<del> </del>
EQT176	20D120/30D240 – IFS Mix Tank							3												†"—		<del></del>	-					<del>                                     </del>	<del> </del>
EQT177	40D250 - Treatment Services Tank			L		3	3	1					1			*		1	M-1								<del> </del>	<del> </del>	<del> </del>
EQT178	40D280 - Treatment Services Tank					3	3	1				i	1					1		_								<del> </del>	
EQT179	40D290 - Treatment Services Tank					3	3	3				<b> </b>	1					ī		<del>                                     </del>								+-	
EQT180	40D200 - Treatment Services Tank					3	3	1				T	1																<del>                                     </del>
EQT181	40D210 - Treatment Services Tank					3	3	3					1		i		H	1		_								+	<del> </del>
EQT182	40D300 - Treatment Services Tank					3	3	3					1					1										<del> </del> -	<del> </del>
EQT183	40D220 - Treatment Services Tank					3	3	3					1					1		├								1	<u> </u>
EQT184	30D103 - Sulfur Unloading Tank																			$\vdash$									<del> </del>
EQT185	M7 – 001 Wastewater Treatment Unit							3				-																	
EQT186	1-06 - Rental Boiler	-		1		1															~							<b> </b>	<del> </del>
FUG002	FUG-ACID – Acid Plant Fugitive Emissions		_																						1				
FUG003	FUG-TS – Treatment Services Fugitive Emissions						. ,	1		1	-	1	1					. 1		·									1
GRP002	CAP-SAU – Sulfuric Acid Units 1 & 2											-						-											
GRP021	CAP-Comb - Combustion (Unit 1, Unit 2, Rental Boiler)							***************************************											·			-							<del> </del>
RLP013	2 – Sulfuric Acid Unit No. 2	- i			1#											3								$\dashv$	——i	1			
RLP014	3 - Sulfuric Acid Unit No. 1	<del>- i  </del>	i		1#	<del>  </del>																		$\dashv$		- L			
1121.014	p - buildile Acid Offic No. 1	1	ı.		<u> </u>					1						3	<u> </u>									1		<u> </u>	1

Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc.

Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

X. A	pplicable Louisiana and Fed	lera	al A	ir (	Qual	ity	Rec	quire	me	ents																			
ID No.:	Description			40	) CFR	60				40	CF	R 61						40 CI	FR 63				4	40 CI 65			40 CF	R	40 CFR 264
		Α	Cd	Db	H	K	Ka	Kb	Α	J	M	V	FF	Α	DD	EEH	F	G*	GGG*	Q	XX*	ZZZZ	Α	С	G	64	68	82	ВВ
PCS001	Spt-Proc - Spent Acid Process	}										T	1																
PCS002	TS-Proc - TS Process																												
EQT277	13 - Acid Plant Caustic Scrubber																												
EQT278	U1-Scbr - Unit 1 Tail Gas Scrubber			T																1									
EQT279	U2-Scbr - Unit 2 Tail Gas Scrubber																												
EQT280	UI-Furn - Unit 1 Furnace												ī					1							1				
EQT281	U2-RFurn - Unit 2 Regen Furnace							1					1					I					1			T	1		
EQT282	U2-SFurn - Unit 2 Sulfur Furnace				1								T			T				1									
EQT283	U1-Proc - Unit 1 Process										T						7						П						
EQT284	U2-Proc - Unit 2 Process																			1									
EQT291	M10 – Diesel Fire-water Pump								<u> </u>							<u> </u>		<u></u>				1							

\*Although a minor source of Hazardous Air Pollutants, the facility is required to comply with the applicable requirements of 40 CFR 63 Subpart G, Subpart GGG, and Subpart XX for streams regulated under these subparts if/when required notice is received from the generator(s) of the regulated material.

"40 CFR 60 Subpart H requirements are being phased in at different times for RLP013 (January 1, 2011) & RLP014 (May 1, 2012).

#### KEY TO MATRIX

- The regulations have applicable requirements that apply to this particular emission source.
- -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

  Blank The regulations clearly do not apply to this type of emission source.

#### Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc. Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Expla	nation for Exemption Status or Non-Applicability of a	Source
ID No:	Requirement	Notes
UNF002 Facility Wide	40 CFR 63 Subpart DD – National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations 40 CFR 63.680(a)	DOES NOT APPLY – Facility is a minor source of emissions of HAPs.
EQT140, 146, 147, 151, 153, 186, and FUG002 (10, 20, 21, 27, 6-90, 1-06, and FUG-ACID)	Emission Standards for Sulfur Dioxide LAC 33:III.1503	EXEMPT - units emit less than 250 TPY of sulfur compounds measured as SO <sub>2</sub> .  LAC 33:III.1503.C
EQT150	Control of Emissions of Organic Compounds – Marine Vapor Recovery LAC 33:III. 2108	DOES NOT APPLY – Uncontrolled emissions are less than 100 tpy of VOCs. LAC 33:III.2108.A
26 – Spent Acid Barge Loading Scrubber	Control of Emissions of Organic Compounds – Waste Gas Disposal LAC 33:III.2115	EXEMPT – Waste gas stream has a combined weight of VOCs equal to or less than 100 pounds in any continuous 24 hour period. LAC 33:III.2115.H.1.c
EQT 151 27 – Acid Plant Vapor Combustor	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQT152 28 - Gasoline Storage Tank	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110b	DOES NOT APPLY – Storage capacity is less than 73 m <sup>3</sup> 40 CFR 60.110b

### Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc.

Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

ID No:	Requirement	Notes
EQT154 and 155 M1a and M1b	Emission Standards for Particulate Matter LAC 33:III.1311.C	EXEMPT – LDEQ has granted an exemption from the opacity standards of LAC 33:III.1311.C as the particulate matter emissions are well below the process rate limitation. LAC 33:III.1311.E
Cooling Towers	40 CFR 63 Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers 40 CFR 63.400	DOES NOT APPLY – The Baton Rouge site does not use chromium-based water treatment chemicals. 40 CFR 63.400(a)
EQT008 Spent Sulfuric Acid Storage Tank	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQTs 161, 163-165, 167- 169, 171 Spent Acid Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT - Compliance with 40 CFR Part 65 will constitute compliance with 2103.

### Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc.

Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Expla	XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source						
ID No:	Requirement	Notes					
EQT176 20D120/30D340 – IFS Mix Tank	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – This tank is grater than 75 m³ and less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa. 40 CFR 60.110b(b)					
CRG001 (EQTs 177, 178, 180) Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.					
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.					
	LAC 33:III.2103.B – Storage of Volatile Organic Compounds	EXEMPT – Tanks at the Baton Rouge Rhodia, Inc. facility used for the storage of corrosive materials are not required to meet the submerged fill pipe provisions of subsections A and B of LAC 33:III.2103 per LAC 33:III.2103.G.7.					

# Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc. Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Exp	anation for Exemption Status or Non-Applicability of a S	ource
ID No:	Requirement	Notes
EQTs 179, 181-183 Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – These vessels have a capacity less than 75 m <sup>3</sup> . 40 CFR 60.110(b)(a)
EQT157 – 159, 162, 166, 170, 173 -175, 285 Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978  40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.

## Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc.

Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Expl:	XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source						
ID No:	Requirement	Notes					
EQT157 – 159, 162, 166, 170, 173 -175, 285 Tanks (cont'd)	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984  40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.					
	40 CFR 60 Subpart Kb – Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984  40 CFR 60.110(b)	DOES NOT APPLY – These tanks do not store VOLs.					
EQT280 Unit 1 Furnace	Control of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.					
FUG002	Fugitive Emission Control for Ozone Nonattainment Areas LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCMI facility per LAC 33:III.Chapter 21.Appendix A.					
FUG-ACID	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	DOES NOT APPLY – This source does not emit any class I or class II TAPs for which site-wide permitted emissions are over the MER. LAC 33:III.5109.A					
FUG003 FUG-TS	Fugitive Emission Control for Ozone Nonattainment Areas LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCMI facility per LAC 33:III.Chapter 21.Appendix A.					

### Sulfuric Acid Plant - Baton Rouge Facility

Rhodia, Inc.
Agency Interest No.: 1314; PER20100009
Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Exp	olanation for Exemption Status or Non-Applicability of a Sc	ource
ID No:	Requirement	Notes
RLP013	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCMI for Process Vents, Storage Vessels, Transfer Operations, and Wastewater 40 CFR 63.138)h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements.  40 CFR 63.138(h)
Sulfuric Acid Unit 2	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
	Emission Standards for Sulfur Dioxide LAC 33:III Chapter 15	EXEMPT – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.
RLP014 Sulfuric Acid Unit l	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCMI for Process Vents, Storage Vessels, Transfer Operations, and Wastewater 40 CFR 63.138)h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements.  40 CFR 63.138(h)

### Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc.

Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Explanation for Exemption Status or Non-Applicability of a Source					
ID No:	Requirement	Notes			
RLP014	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.			
Sulfuric Acid Unit 1 (cont'd)	Emission Standards for Sulfur Dioxide LAC 33:III Chapter 15	EXEMPT starting on May 1, 2012 – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.			

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

#### Sulfuric Acid Plant - Baton Rouge Facility Rhodia, Inc. Agency Interest No.: 1314; PER20100009 Baton Rouge, East Baton Rouge Parish, Louisiana

Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.

- a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (LA MACT for Refineries) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.
- b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Sulfuric Acid Plant	LAC 33:III.Chapter 51, LA MACT Determination for non-HON	≥ 5% VOTAP	LA MACT Determination for non-HON
·	40 CFR 61 Subpart V, National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	≥ 5% VOHAP	
	40 CFR 264 Subpart BB, RCRA Subpart BB	≥ 10% Organic	

(x,y) = (x,y) + (x,y

#### **General Information**

Al ID: 1314 Rhodia Inc

#### Activity Number: PER20100009 Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

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ID	Name	User Group	Start Date
0840-00033	Rhodia Inc	CDS Number	08-05-2002
LAD008161234	Rhodia Inc	Hazardous Waste Notification	11-17-1980
PMT/PC	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
00861	Rhone Ponlenc Basic Chemical Co	Inactive & Abandoned Sites	11-23-1999
LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites	11-23-1999
LA0005223	LPDES#	LPDES Permit #	05-22-2003
	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
GL-349	Radiation General License	Radiation License Number	12-14-2000
LA-338A-N01	Radioactive Material License	Radiation License Number	12-14-2000
G-033-3198	Site ID #	Solid Waste Facility No.	11-21-1999
22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge	01-07-2002
38329	Stauffer Chemical	TEMPO Merge	11-19-2001
38427	Rhodia Inc	TEMPO Merge	01-11-2001
70821STFFRAIRLI	TRI#	Toxic Release Inventory	07-19-2004

Physical Location:

1275 Airtine Hwy Baton Rouge, LA 70805

Main FAX: Main Phone: 2253593722 2253593481

Mailing Address:

1275 Airline Hwy

Baton Rouge, LA 70805

Location of Front Gate:

30.509861 latitude, -91.18465 longitude, Coordinate Method: Lat.\Long. - DMS, Coordinate Datum: NAD83

Related People:

Name	Mailing Address	Phone (Type)	Relationship
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593443 (WF)	Accident Prevention Contact for
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593742 (WP)	Accident Prevention Contact for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation Contact For
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation License Billing Party for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Water Billing Party for
Tricia Castille	PO Box 828, Baton Rouge, LA 70821	2253593410 (WP)	Haz. Waste Billing Party for
J. Marcus Lewis	PO Box 828 Baton Rouge, LA 708210828	2253567111 (WP)	Responsible Official for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Emission Inventory Facility Contact for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Emission Inventory Facility Contact for

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#### **General Information**

Al ID: 1314 Rhodia Inc

Activity Number: PER20100009 Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

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Rhodia Inc Rhodia Inc Rhodia Inc Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805 1275 Airline Hwy Baton Rouge, LA 70805 c/o CT Corporation System Baton Rouge, LA 70808 1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP) 225-359-3768 (WP) 225-359-3768 (WP)	Air Billing Party for Operates Agent of Service for Emission Inventory Billing Party
Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Owns
RRR	hodia Inc hodia Inc hodia Inc hodia Inc	hodia Inc 1275 Airline Hwy Baton Rouge, LA 70805 hodia Inc c/o CT Corporation System Baton Rouge, LA 70808 hodia Inc 1275 Airline Hwy Baton Rouge, LA 70805 hodia Inc 1275 Airline Hwy Baton Rouge, LA 70805	hodia Inc 1275 Airline Hwy Baton Rouge, LA 70805 225-359-3768 (WP) hodia Inc c/o CT Corporation System Baton Rouge, LA 70808 hodia Inc 1275 Airline Hwy Baton Rouge, LA 70805 225-359-3768 (WP)

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3 Air - Title V Regular Permit Major Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Spent Acid	d Process					
ARE 0002	M4 - West End Sump			55 gallons/mo	55 gallons/mo oil skimmed from sump	8760 hr/yr
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	950000 gallons				8760 hr/yr
EQT 0150	26 - Spent Acid Barge Loading Scrubber		800 gallons/min	28.4 MM gallons/yr		1664 hr/yr
EQT 0151	27 - Acid Plant Vapor Combustor		1161 gallons/min	728000 tons/yr	Operating rates shown are spent acid receipts. Control device-vapor combustor (95% eff. VOC).	8760 hr/yr
EQT 0161	30D070 - Spent Acid Tank	125655 gallons			The second state of the second	8760 hr/yr
EQT 0163	30D100 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0164	30D110 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0165	30D120 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0167	30D140 - 99/Oleum/Spent	331612 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0168	30D150 - 99/Oleum/Spent	285198 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0169	30D160 - Spent Acid Tank	285900 gallons				8760 hr/yr
EQT 0171	30D190 - Spent Acid Tank	285318 gallons				8760 hr/yr
EQT 0176	20D120/30D240 - IFS Mix Tank	25000 gallons				8760 hr/yr
EQT 0185	M7 - 001 Wastewater Treatment Unit			330000 gallons/day		8760 hr/yr
	13 - Acid Plant Caustic Scrubber			315 gallons/min	The control device is a scrubber (99% eff. SO2). Works in series with EIQ 27.	2190 hr/yr
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions					8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

#### Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
TS Proces	s		***************************************			. <b>.</b>
ARE 0003	M3 - Treatment Services Sumps			2500 gallons/day	<u>.</u>	8760 hr/yr
	21 - TS Vapor Combustor		8 MM BTU/hr	3 MM BTU/hr	Previously Identified as Emergency Flare Stack	8760 hr/yr
	40D250 - Treatment Services Tank	157000 gallons		**************************************	Linergency ritare Stack	8760 hr/yr
EQT 0178	40D280 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0179	40D290 - Treatment Services Tank	12000 gallons				8760 hr/yr
	40D200 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0181	40D210 - Treatment Services Tank	12000 gallons	·			8760 hr/yr
	40D300 - Treatment Services Tank	8000 gallons				8760 hr/yr
QT 0183	40D220 - Treatment Services Tank	8000 gallons				8760 hr/yr
QT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber		41 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	900 tons/day		8760 hr/yr
QT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber			1900 tons/day		8760 hr/yr
QT 0280	U1-Furn - Unit 1 Furnace			900 tons/day		8760 hr/yr
QT 0281	U2-RFurn - Unit 2 Regen Furnace		, , , , , , , , , , , , , , , , , , , ,	1200 tons/day		8760 hr/yr
	U2-SFurn - Unit 2 Sulfur Furnace			700 tons/day		8760 hr/yr
	U1-Proc - Unit 1 Process			900 tons/day		8760 hr/yr
	U2-Proc - Unit 2 Process			1900 tons/day	the first demand of the control of t	8760 hr/yr
	FUG-TS - Treatment Services Fugitive Emissions					8760 hr/yr
	2 - Sulfuric Acid Unit No. 2		2280 tons/day	1900 tons/day		8760 hr/yr
RLP 0014	3 - Sulfuric Acid Unit No. 1		1080 tons/day	900 tons/day		8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3 Air - Title V Regular Permit Major Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
	Description	Tank Volume	max. Operating nate	normal operating rate	Johnson	operating rane
acility Wi	de					
	10 - Preheater; Acit Unit No. 1		6 MM BTU/hr	6 MM BTU/hr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
QT 0141	11 - Lime Silos		22.5 tons/hr	135 Tons lime/year	Out of service,	6 hr/yr
QT 0142	12 - Oleum Loading Vent Scrubber		150 gallons/min	2.664 MM gallons/yr		672 hr/yr
QT 0146	20 - Sulfur Feed Tank	84460 galions	110 gallons/min	44.6 MM gallons/yr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
QT 0149	24 - Oleum Barge Loading Scrubber		600 gallons/min	12.96 MM gailons/yr		400 hr/yr
QT 0152	28 - Gasoline Storage Tank	1000 gallons	10000 gallons/yr	10000 gallons/yr		8760 hr/yr
QT 0153	6-90 - Package Boiler		106 MM BTU/hr	50 MM BTU/hr		8760 hr/yr
EQT 0154	M1a - Unit 2 Cooling Tower			36000 gallons/min		8760 hr/yr
QT 0155	M1b - Unit 1 Cooling Tower	1		16000 gallons/min		8760 hr/yr
QT 0157	30D030 - Oleum Tank	158605 gallons	* ************************************			8760 hr/yr
QT 0158	30D040 - 93/Oleum	158605 gallons	,		Insignificant when storing Product Sulfuric Acid	8760 hr/yr
EQT 0159	30D050 - 99WW Tank	158605 gallons			Out of Service; Insignificant when storing Product Sulfuric Acid	8760 hr/yr
QT 0166	30D130 - Oleum Tank	331612 gallons				8760 hr/yr
QT 0170	30D180 - 93E Tank	285247 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
	30D210 - 93E Tank	406414 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
	30D220 - 99WW Tank	406356 gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
QT 0175	30D230 - 99C Tank	1,65 million gallons			Insignificant when storing Product Sulfuric Acid	8760 hr/yr
QT 0184	20D103 - Sulfur Unloading Tank	150 gallons				8760 hr/yr
QT 0186	1-06 - Rental Boiler		133 MM BTU/hr	133 MM BTU/hr		8760 hr/yr
QT 0285	20D380 - Unit 2 Weak Acid Tank	21000 gallons			Insignificant Activity per LAC 33:III.501.B.5.D	8760 hr/yr
EQT 0291	M10 - Diesel Fire-Water Pump		200 horsepower	200 horsepower		500 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Spent Aci	d Process						
ARE 0002	M4 - West End Sump						72
EQT 0150	26 - Spent Acid Barge Loading Scrubber	27.81	1000	.87		13	120

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3 Air - Title V Regular Permit Major Mod

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ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature
Spent Acid Process					(-4	(,0,0,1)	
EQT 0151 27 - Acid Plant Vapor 0	Combustor	2	2400			35	4250
EQT 0185 M7 - 001 Wastewater						აე	1350
FUG 0002 FUG-ACID - Acid Plant	Fugitive Emissions						72
TS Process							/2
ARE 0003 M3 - Treatment Service	es Sumps						
EQT 0147 21 - TS Vapor Combus	tor	4	6786	6	. '		/2
FUG 0003 FUG-TS - Treatment S						50	1000
RLP 0013 2 - Sulfuric Acid Unit N		113	107980			· · · · · · · · · · · · · · · · · · ·	72
RLP 0014 3 - Sulfuric Acid Unit N		119	50640	4.5		130	90
Facility Wide		110	30040	J		130	90
EQT 0140 10 - Preheater; Acit Un	t No. 1	69	13006	2		38	1200
EQT 0141 11 - Lime Silos		6.7	250	.89		55	
EQT 0142 12 - Oleum Loading Ve	nt Scrubber	4.4	. 51.84	.5		15	100
EQT 0146 20 - Sulfur Feed Tank		2.7	183.22	1.2		30	284
EQT 0149 24 - Oleum Barge Load	ing Scrubber	19.7	100	.33		13	72
EQT 0152 28 - Gasoline Storage	fank	0 ,	.02	.33			72
EQT 0153 6-90 - Package Boiler		25	14000	3.5		60	850
EQT 0154 M1a - Unit 2 Cooling To	ower	25.6	945476	28		46	89
EQT 0155 M1b - Unit 1 Cooling To	ower	27.9	526811	20		46	
EQT 0186 1-06 - Rental Boiler		15.4	22000	5.5		20	89
EQT 0291 M10 - Diesel Fire-Wate	r Pump	6.5	76.8	5.5	PPT 18.4 (0.8 h	9,25	470 355

Relationships:

ID <sup>.</sup>	Description	Relationship	ID	Description
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0157	30D030 - Oleum Tank
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0158	30D040 - 93/Oleum
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0166	30D130 - Oleum Tank
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
EQT 0147.	21 - TS Vapor Combustor	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3 Air - Title V Regular Permit Major Mod

#### Relationships:

ID	Description			
	Description	Relationship	·   ID	Description
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0167	30D140 - 99/Ołeum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0184	20D103 - Sulfur Unloading Tank	Vents to	EQT 0146	20 - Sulfur Feed Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Vents to	EQT 0151	27 - Acid Plant Vapor Combustor
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Vents to	RLP 0014	3 - Sulfuric Acid Unit No. 1
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Controls emissions from	EQT 0283	U1-Proc - Unit 1 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Controls emissions from	EQT 0284	U2-Proc - Unit 2 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Vents to	RLP 0013	2 - Sulfuric Acid Unit No. 2
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3 Air - Title V Regular Permit Major Mod

#### Relationships:

ID	Description	Relationship	ID	Description
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
QT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank
QT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank
QT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
QT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
QT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
QT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0183	
QT 0283	U1-Proc - Unit 1 Process	Controls emissions from	EQT 0280	40D210 - Treatment Services Tank
QT 0284	U2-Proc - Unit 2 Process	Controls emissions from		U1-Furn - Unit 1 Furnace
QT 0284	U2-Proc - Unit 2 Process		EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace
		Controls emissions from	EQT 0281	U2-RFurn - Unit 2 Regen Furnace

#### Subject Item Groups:

ID	Group Type	Group Description
CRG 0001	Common Requirements Group	CRG001 - 40D250, 40D280, and 40D200
CRG 0002	Common Requirements Group	CRG002 - 40D290, 40D210, 40D300, and 40D220
CRG 0003	Common Requirements Group	CRG003 - Spent Acid Tanks
CRG 0004	Common Requirements Group	CRG004 - 99/Oleum/Spent Swing Tanks
GRP 0002	Equipment Group	CAP-SAU - SULFURIC ACID UNITS 1 & 2
GRP 0021	Equipment Group	CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)
PCS 0001	Process Group	Spt-Proc - Spent Acid Process
PCS 0002	Process Group	TS-Proc - TS Process
UNF 0002	Unit or Facility Wide	UNF02 - Facility Wide

#### Group Membership:

ID	Description	Member of Groups
ARE 0002	M4 - West End Sump	PCS000000001
ARE 0003	M3 - Treatment Services Sumps	PCS0000000002
CRG 0001	CRG001 - 40D250, 40D280, and 40D200	PC\$000000002
CRG 0002	CRG002 - 40D290, 40D210, 40D300, and 40D220	PCS0000000002
CRG 0003	CRG003 - Spent Acid Tanks	PCS0000000001
CRG 0004	CRG004 - 99/Oleum/Spent Swing Tanks	PCS0000000001
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	CRG000000003, PCS000000001
EQT 0147	21 - TS Vapor Combustor	PCS0000000002
EQT 0150	26 - Spent Acid Barge Loading Scrubber	PCS0000000001

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#### Group Membership:

ID	Description	Member of Groups
EQT 0151	27 - Acid Plant Vapor Combustor	PCS000000001
EQT 0161	30D070 - Spent Acid Tank	CRG000000003, PCS000000001
EQT 0163	30D100 - Spent Acid Tank	. CRG000000003, PCS000000001
EQT 0164	30D110 - Spent Acid Tank	CRG000000003, PCS0000000001
EQT 0165	30D120 - Spent Acid Tank	CRG000000003, PCS0000000001
EQT 0167	30D140 - 99/Oleum/Spent	CRG000000004, PCS000000001
EQT 0168	30D150 - 99/Oleum/Spent	CRG0000000004, PCS0000000001
EQT 0169	30D160 - Spent Acid Tank	CRG000000003, PCS000000001
EQT 0171	30D190 - Spent Acid Tank	CRG000000003, PCS000000001
EQT 0176	20D120/30D240 - IFS Mix Tank	PCS000000001
EQT 0177	40D250 - Treatment Services Tank	CRG000000001, PCS0000000002
EQT 0178	40D280 - Treatment Services Tank	CRG000000001, PCS0000000002
EQT 0179	40D290 - Treatment Services Tank	CRG000000002, PCS0000000002
EQT 0180	40D200 - Treatment Services Tank	CRG000000001, PCS0000000002
EQT 0181	40D210 - Treatment Services Tank	CRG000000002, PCS0000000002
EQT 0182	40D300 - Treatment Services Tank	CRG000000002, PCS0000000002
EQT 0183	40D220 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0185	M7 - 001 Wastewater Treatment Unit	PCS000000001
EQT 0186	1-06 - Rental Boiler	GRP000000021
EQT 0277	13 - Acid Plant Caustic Scrubber	PCS0000000001
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	PCS000000002
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	PCS0000000002
EQT 0280	U1-Furn - Unit 1 Furnace	PC\$000000002
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	PCS0000000002
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace	PCS0000000002
EQT 0283	U1-Proc - Unit 1 Process	PCS0000000002
EQT 0284	U2-Proc - Unit 2 Process	PCS000000002
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions	PCS000000001
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions	PCS0000000002
RLP 0013	2 - Sulfuric Acid Unit No. 2	GRP0000000002, GRP0000000021, PCS0000000002
RLP 0014	3 - Sulfuric Acid Unit No. 1	GRP0000000002, GRP0000000021, PCS0000000002

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

#### Annual Maintenance Fee:

Fee Number	Air Contamin	ant Source	Multiplier	Units Of Measure
0540	0540 Sulphuric Acid Manufacture (	Rated Capacity)	2800	tons/day
SIC Codes:			·	
2819 Industrial	inorganic chemicals, nec	Al 1314		

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

SIC Codes:

2819 Industrial inorganic chemicals, nec	UNF 002

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3 Air - Title V Regular Permit Major Mod

#### All phases

1	CO	CO NOx				PM10			SO2			Voc			
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max Ib/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Yea
Spent Acid Proce	is _												,		
ARE 0002 <sub>M4</sub>													0.03		0.14
EQT 0150 26										0.002	0.03	<0.01	1,12	51.40	0.93
EQT 0151 27	0.77	3.90	3.37	0.24	1.10	1.05	0.01	0.03	0.03	0.01	0.04	0.04	0.85	31.58	3.71
EQT 0185 M7													0.44		1.91
FUG 0002 FUG-ACID										0.31		1,38	0.15		0.65
TS Process															İ
ARE 0003 мз													0.02		0.07
EQT 0147 21	0.01	0.01	0.02	0.59	0.64	2.58	0.02	0.06	0.10	0.02	0.04	0.07	0.21	0.28	0.92
FUG 0003 FUG-TS													0.67		2.94
RLP 0013 2		74.61			134.56	,	·	23.75						1.84	
RLP 0014 3		44.26			63.27			11.25			-			0.52	
Facility Wide		1									1				
EQT 0140	0.47	0.47	2.06	0.56	0.56	2.45	0.04	0.04	0.19	0.03	0.03	0.14	0.03	0.03	0.13
EQT 0141							2.48		0.01						
EQT 0146 20										0.003		0.01	0.004		0.02
EQT 0152 28													0.07		0.29
EQT 0153 6-90	8.85	18.76	38.76	4.00	21.20	17.52	0.60	1.27	2.63	0.27	0.58	1.20	1.40	2.97	6.13
EQT 0154 <sub>M1a</sub>			:				0.63		2.76						
EQT 0155 M1b							0.28		1,23						
EQT 0186 1-06		3.59			5.05			0.99			80.0			0.72	1
EQT 0291 <sub>M10</sub>	1.34		0.33	6.20		1.55	0.44		0.11	0.41		0.10	0.50		0.13
GRP 0021 CAP-Comb	11.69		51.22	21.00		91.98	11.67		51.10				1.96		8.58

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3 Air - Title V Regular Permit Major Mod

#### All phases

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Al ID: 1314 - Rhodia Inc

Activity Number: PER20100009 Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

#### Phase I

	SO2		
Subject Item	Avg lb/hr	Max ib/hr	Tons/Year
TS Process	,		
RLP 0014 3		904,17	
Facility Wide	]		
GRP 0021 CAP-Comb	2841.67		12446.50

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

#### Emission rates Notes:

GRP 0021	SO2	Avg lb/hr	Phase I is effective from issuance of this permit through December 31, 2010. Which Months: All Year
GRP 0021	SO2	Tons/Year	Phase I is effective from issuance of this permit through December 31, 2010. Which Months: All Year
RLP 0014	SO2	Max lb/hr	Max lbs/hr effective from permit issuance until April 30, 2012. A 3-hour average becomes effective on May 1, 2012. Which Months: All Year

Al ID: 1314 - Rhodia Inc

Activity Number: PER20100009 Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

#### Phase II

	SO2		***************************************
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year
TS Process			
RLP 0014 3		904.17	
Facility Wide			
GRP 0021 CAP-Comb	1078.34		4723.13

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

#### **Emission rates Notes:**

GRP 0021	SO2	Phase II is effective from January 1, 2011 through April 30, 2012. Which Months: All Year  Phase II is effective from January 1, 2011 through April 30, 2012. Which Months: All Year	
RLP 0014	SO2	Max lbs/hr effective from permit issuance until April 30, 2012. A 3-hour average becomes effective on May 1, 2012. Which Months: All Y	Year

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

#### Phase III

	SO2			
Subject Item	Avg lb/hr	Tons/Year		
Facility Wide	1			
GRP 0021 CAP-Comb	245.42	1074.94		

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

#### Emission rates Notes:

GRP 0021	SO2	Avg lb/hr	Phase III becomes effective on May 1, 2012.	Which Months: All Year
GRP 0021	SO2	Tons/Year	Phase III becomes effective on May 1, 2012.	Which Months: All Year

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0142	Sulfuric acid	0.01	0.09	<0.01
EQT 0146 20	Carbon disulfide	0.004		0.02
	Hydrogen sulfide	0.10		0.44
EQT 0147 21	Chlorine	0.02	0.10	0.09
	Hydrochloric acid	0.08	0.42	0.36
EQT 0149 24	Sulfuric acid	0.004	0.01	<0.01
EQT 0151	Chlorine	0.02	0.54	0.09
	Hydrochloric acid	0.09	2.20	0.39
EQT 0152	2,2,4-Trimethylpentane	0.001		<0.01
	Benzene ·	0.001		<0.01
	Ethyl benzene	<0.001		<0.01
	Toluene	0.001		<0.01
	Xylene (mixed isomers)	<0.001		<0.01
	n-Hexane	0.001		<0.01
FUG 0002 FUG-ACID	Sulfuric acid	0.10		0.46
GRP 0002 CAP-SAU	Antimony (and compounds)	0.007		0.032
	Arsenic (and compounds)	0.005		0.022
	Barium (and compounds)	0.041		0.181
	Beryllium (Table 51.1)	0.003,		0.012
	Cadmium (and compounds)	0.003		0.012
	Chlorine	0.02		0.09
	Chromium VI (and compounds)	0.007		0.030
	Cobalt compounds	0.01		0.03
	Copper (and compounds)	0.025		0.111
	Hydrochloric acid	1.09		4.79
	Lead compounds	0.02		0.08
	Manganese (and compounds)	0.02		0.08
	Mercury (and compounds)	0.003		0.012
	Nickel (and compounds)	0.009		0.038
	Selenium (and compounds)	0.013		0.056
	Sulfuric acid	9.57		41.90
	Zinc (and compounds)	0.05		0.22
PCS 0001 Spt-Prec	1,1,1-Trichloroethane	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0001 I-Proc	1,1,2,2-Tetrachloroethane	0.005		0.02
	1,1,2-Trichloroethane	0.05		0.20
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	<0.001		0.001
	1,2-Dichloroethane	0.001	-	0.002
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	<0.001		0.001
	1,3-Dichloropropene	0.005		0.02
•	1,4-Dichlorobenzene	0.11		0.50
	1,4-Dioxane	0.01		0.05
	2,2'-dichlorodiethylether	0.03		0.11
	2,2,4-Trimethylpentane .	0.11		0.50
	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11		0.50
	2,4-Dinitrotoluene	0.002		0.01
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.002	ļ	0.01
•	2-Acetylaminofluorene	0.11		0.50
	2-nitro-Propane	0.03		0.14
	3,3'-Dichlorobenzidine	0.11	Transition is	0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	4-Dimethylaminoazobenzene	0.11	:	0.50
	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.01	;	0.04
	Acetamide	0.11		0.50
	Acetonitrile	0.06		0.25
	Acetophenone	0.11		0.50
	Acrolein	<0.001		0.001
	Acrylamide	<0.001		0.001
	Acrylic acid	0.005		0.02
	Acrylonitrile	<0.001		0.002
	Allyl chloride	<0.001		0.001
	Amiben	0.11		0.50
	Ammonia	0.01		0.06
	Aniline	0.01		0.03
	Benzene	0.002		0.01
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
•	Benzyl chloride	0.11		0.50
	Biphenyl	0.002		0.01
	Bromoform	0.11		0.50
	Butene (míxed isomers)	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
	Carbaryl	0.11		0.50
	Carbon disulfide	0.03		0.12
	Carbon tetrachloride	0.002		0.01
	Carbonyl sulfide	0.01		0.05
	Chlordane	0.11		0.50
,	Chlorine dioxide	<0.001		0.001
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	<0.001		0.001
	Chloroethane	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 lpt-Proc	Chloroform	0.002		0.01
	Chloromethyl methyl ether	0.11	:	0.50
	Chloroprene	0.03		0.14
	Cresol	0.02		0.08
	Cumene	0.11		0.50
•	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.002		0.01
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.005		0.02
	Dichloromethane	0.01		0.03
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
	Epichlorohydrin	0.04		0.17
•	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.02		0.08
	Ethyl benzene	0.11		0.50
	Ethylene	0.11		0.50
	Ethylene glycol	0.10		0.45
	Ethylene oxide	<0.001		0.002
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11	,	0.50
	Formaldehyde	0.002	1	0.01
•	Glycol ethers (Table 51.1)	0.01		0.06
	Glycol ethers (Table 51.3)	0.11	. !	0.50
	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.01		0.04
	Hexachlorobutadiene	<0.001		0.001
	Hexachlorocyclopentadiene	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0001 pt-Proc	Hexachloroethane	0.01		0.04
	Hexamethylene diisocyanate	0.11		0.50
	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	<0.001		0.001
	Hydrofluoric acid	0.002		0.01
	Hydrogen cyanide	0.01		0.04
	Hydrogen sulfide	0.002		0.01
	Hydroquinone	0.11		0.50
	lodomethane	0.11		0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.002		0.01
	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl Isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50
	Methyl chloride	0.09		0.39
-	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002		0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
	Naphthalene (and Methyl naphthalenes)	0.02		0.10
	Nitric acid	0.005		0.02
	Nitrobenzene	0.005		0.02
,	Parathion	0.11	* * * * * * * * * * * * * * * * * * *	0.50
	Pentachloronitrobenzene	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
S 0001 -Proc	Phenol	0.005		0.02
	Phosgene	<0.001		0.002
	Phosphine	0.11		0.50
	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.005	-	0.02
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	<0.001		0.001
	Propionaldehyde	0.01		0.04
	Ргорохиг	0.11		0.50
	Propylene	0.11		0.50
	Propylene oxide	0.01		0.04
	Propylenimine	0.11		0.50
	Pyridine	0.01		0.06
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.02		0.10
	Tetrachloroethylene	0.03		0.14
	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	<0.001		0.001
	Toluene-2,6-Diisocyanate	<0.001		0.001
	Toxaphene	0.11		0.50
	Toxic air pollutants (TAP)	0.21		0.59
	Trichloroethylene	0.01		0.05
	Triethył amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.03		0.13
	Vinyl bromide	0.11		0.50
	Vinyl chloride	0.002		0.01
	Vinylidene chloride	0.02		0.08
	Xylene (mixed isomers)	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001	alpha-Chloroacetophenone	0.11	:	0.50
	beta-Propriolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50
	n-Hexane	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11	·	0.50
	p,p'-DDE	0.11		0.50
	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11		0.50
CS 0002 S-Proc	1,1,1-Trichloroethane	0.11		0.50
	1,1,2,2-Tetrachloroethane	0.03		0.12
	1,1,2-Trichloroethane	0.11		0.50
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	0.003		0.011
	1,2-Dichloroethane	0.005		0.021
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11	:	0.50
	1,3-Butadiene	0.003		0.011
	1,3-Dichloropropene	0.03		0.14
	1,4-Dichlorobenzene	0.11		0.50
	1,4-Dioxane	0.10		0.44
	2,2'-dichlorodiethylether	0.11		0.50
	2,2,4-Trimethylpentane	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0002 3-Proc	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenot	0.11	i .	0.50
	2,4-Dinitrotoluene	0.01	***************************************	0.03
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.01		0.03
	2-Acetylaminofluorene	0.11		0.50
	2-nitro-Propane	0.11		0.50
	3,3'-Dichlorobenzidine	0.11		0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11	· · · · · · · · · · · · · · · · · · ·	0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50
	4-Dimethylaminoazobenzene	0.11		0.50
`	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.07		0.30
	Acetamide	0.11		0.50
	Acetonitrile	0.11		0.50
	Acetophenone	0.11		0.50
	Acrolein	0.003		0.011
	Acrylamide	0.003		0.011
	Acrylic acid	0.04		0.17
	Acrylonitrile	0.003		0.015
	Allyl chloride	0.003		0.011
	Amiben	0.11		0.50
	Ammonia	0.11		0.50
	Aniline	0.06		0.26
	Benzene	0.02		0.10
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
	Benzyl chloride	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 TS-Proc	Biphenyl	0.01		0.03
	Bromoform	0.11		0.50
	Butene (mixed isomers)	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
	Carbaryl	0.11		0.50
	Carbon disulfide	0.11		0.50
	Carbon tetrachloride	0.01		0.03
	Carbonyl sulfide	0.10		0.43
	Chlordane	0.11		0.50
	Chlorinated Dibenzo-P-Dioxins	0.0000001		0.00000005
	Chlorinated dibenzofurans	0.00000001		0.00000005
	Chlorine dioxide	0.003		0.011
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	0.003		0.011
	Chloroethane	0.11		0.50
	Chloroform	0.005		0.02
	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.11		0.50
	Cresol	0.11		0.50
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.03		0.11
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.04		0.16
	Dichloromethane	0.05		0.23
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11 ·		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0002 S-Proc	Epichlorohydrin	0.11		0.50
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.11		0.50
	Ethyl benzene	0.11		0.50
	Ethylene	0.11		0.50
	Ethylene glycol	0.11		0.50
	Ethylene oxide	0.003		0.015
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11		0.50
	Formaldehyde	0.03		0.11
	Glycol ethers (Table 51.1)	0.11		0.50
•	Glycol ethers (Table 51.3)	0.11		0.50
4	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.08		0.37
	Hexachlorobutadiene	0.003		0.011
	Hexachlorocyclopentadiene	0.11		0.50
	Hexachloroethane	0.07		0.30
	Hexamethylene diisocyanate	0.11		0.50
	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	0.003		0.011
	Hydrofluoric acid	0.005		0.02
	Hydrogen cyanide	0.08		0.34
	Hydrogen sulfide	0.01		0.04
	Hydroquinone	0.11		0.50
	lodomethane	0.11	1	0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
:	Maleic anhydride	0.005		0.02
	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl Isocyanate	0.11	1	0.50
•	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0002 3-Proc	Methyl chloride	0.11		0.50
0002	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002		0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0,50
	Naphthalene (and Methyl naphthalenes)	0.11		0.50
	Nitric acid	0.03		0.12
	Nitrobenzene	0.04		0.17
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenol	0.04		0.16
	Phosgene	0.003		0.012
	Phosphine	0.11		0.50
	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.04		0.17
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	0.003		0.011
	Propionaldehyde	0.07		0.30
	Propoxur	0.11		0.50
	Propylene	0.11		0.50
	Propylene oxide	0.07		0.30
	Propylenimine	0.11		0.50
	Pyridine	0.11	·	0.50
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 S-Proc	Tetrachloroethylene	0.11		0.50
	Titanium tetrachloride	0.11	•	0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	0.003		0.011
	Toluene-2,6-Diisocyanate	0.003		0.011
	Toxaphene	0.11	· · · · · · · · · · · · · · · · · · ·	0.50
	Toxic air pollutants (TAP)	0.46		2.03
	Trichloroethylene	0.09		0.38
	Triethyl amine	0.11		0.50
	Trifluratin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.11		0.50
	Vinyl bromide	0.11		0.50
-	Vinyl chloride	0.02		0.10
	Vinylidene chloride	0.11		0.50
	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11		0.50
•	beta-Propriolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50
	n-Hexane	0.11		0.50
•	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11		0.50
	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11		0.50
0013	Antimony (and compounds)		0.671	
	Arsenic (and compounds)	.	0.001	
	Barium (and compounds)		1.313	
	Beryllium (Table 51.1)		0.001	

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
RLP 0013	Cadmium (and compounds)		0.001	1
	Chlorine	:	0.05	
	Chromium VI (and compounds)		0.006	!
	Cobalt compounds		0.17	
	Copper (and compounds)		0.632	
	Hydrochloric acid		2.12	
	Lead compounds		0.12	
	Manganese (and compounds)		0.43	
	Mercury (and compounds)		0.013	
	Nickel (and compounds)		0.006	
	Selenium (and compounds)		0.413	
	Sulfuric acid		11.88	
	Zinc (and compounds)		1.24	
P 0014	Antimony (and compounds)		0.466	
	Arsenic (and compounds)		0.004	
	Barium (and compounds)		0.778	
•	Beryllium (Table 51.1)		<0.001	
	Cadmium (and compounds)		<0.001	
••	Chlorine		0.20	
	Chromium VI (and compounds)		0.001	
	Cobalt compounds		0.11	
•	Copper (and compounds)		0.379	
	Hydrochloric acid		14.87	
	Lead compounds		0.08	
	Manganese (and compounds)		0.26	
	Mercury (and compounds)		0.011	
	Nickel (and compounds)		0.003	
	Selenium (and compounds)		0.373	
	Sulfuric acid		5.63	
<i>y</i> *	Zinç (and compounds)		0.75	
NF 0002 IF02	1,1,1-Trichloroethane			1.00
11 02	1,1,2,2-Tetrachloroethane	0.006 0.413 11.88 1.24 0.466 0.004 0.778 <0.001 <0.001 0.20 0.001 0.11 0.379 14.87 0.08 0.26 0.011 0.003 0.373 5.63	0.14	
	1,1,2-Trichloroethane			0.70

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
INF 0002 NF02	1,1-Dichloroethane			1.00
	1,1-Dimethylhydrazine			1.00
	1,2,4-Trichlorobenzene		:	1.00
	1,2-Dibromo-3-chloropropane			1.00
	1,2-Dibromoethane			0.012
	1,2-Dichloroethane			0.023
	1,2-Dichloropropane			1.00
	1,2-Diphenylhydrazine			1.00
	1,2-Epoxybutane			1.00
•	1,2-Epoxyethylbenzene		// // // // // // // // // // // // //	1.00
	1,2 Oxathiolanc 2,2-dioxide			1.00
	1,3-Butadiene			0.012
	1,3-Dichloropropene	·		0.16
	1,4-Dichlorobenzene			1.00
	1,4-Dioxane		-	0.49
	2,2'-dichlorodiethylether			0.61
	2,2,4-Trimethylpentane			1.01
	2,4,5-Trichlorophenol			1.00
	2,4,6-Trichlorophenol			1.00
	2,4-Dichlorophenoxyacetic Acid			1.00
	2,4-Dinitrophenol			1.00
	2,4-Dinitrotoluene			0.04
	2,4-Toluene diamine			1.00
	2,6-Dinitrotoluene		·	0.04
	2-Acetylaminofluorene			1.00
	2-nitro-Propane		F	0.64
	3,3'-Dichlorobenzidine			1.00
	4,4'-Methylenebis-(2-Chloroaniline)			1.00
	4,4'-Methylenebisbenzeneamine			1.00
	4,6 Dinitro-o-cresol			1.00
	4-Aminodiphenyl		·	1.00
	4-Dimethylaminoazobenzene			1.00
	4-Nitrobiphenyl		- · · · · · · · · · · · · · · · · · · ·	1.00

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	4-Nitrophenol			1.00
	Acetaldehyde			0.34
	Acetamide	:		1.00
	Acetonitrile	i :		0.75
	Acetophenone			1.00
•	Acrolein			0.012
	Acrylamide			0.012
	Acrylic acid			0.19
-	Acrylonitrile			0.017
	Allyl chloride			0.012
	Amiben		·	1.00
	Ammonia		·	0.56
•	Aniline			0.29
	Antimony (and compounds)			0.032
	Arsenic (and compounds)		1	0.022
	Barium (and compounds)			0.181
	Benzene			0.12
	Benzidine	,		1.00
	Benzotrichloride			1.00
	Benzyl chloride			1.00
	Beryllium (Table 51.1)			0.012
	Biphenyl			0.04
	Bromoform			1.00
	Butene (mixed isomers)			1.00
	Cadmium (and compounds)			0.012
	Calcium cyanamide			1.00
	Captan			1.00
	Carbaryl			1.00
	Carbon disulfide			0.64
	Carbon tetrachloride			0.04
	Carbonyl sulfide		:	0.48
	Chlordane			1.00
	Chlorinated Dibenzo-P-Dioxins			0.00000005

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
JNF 0002 JNF02	Chlorinated dibenzofurans			0.00000005
	Chlorine		3	0.27
	Chlorine dioxide			0.012
	Chloroacetic acid			1.00
	Chlorobenzene		:	0.012
	Chloroethane			1.00
	Chloroform			0.03
	Chloromethyl methyl ether			1.00
# _=	Chloroprene			0.64
	Chromium VI (and compounds)			0.030
	Cobalt compounds			0.03
	Copper (and compounds)			0.111
	Cresol			0.58
	Cumene			1.00
•	Cyanide compounds			1.00
•	Diaminotoluene (mixed isomers)			0.12
	Diazomethane			1.00
	Dibutyl phthalate			0.18
	Dichloromethane			0.26
	Dichlorvos			1.00
	Diethanolamine			1.00
	Diethyl Sulfate			1.00
	Dimethyl formamide			1.00
	Dimethyl phthalate			1.00
	Dimethyl sulfate		:	1.00
4	Dimethylcarbamoyl chloride			1.00
· ·	Epichlorohydrin			0.67
	Ethyl 4,4'-Dichtorobenzilate			1.00
	Ethyl Acrylate			0.58
	Ethyl benzene			1.01
	Ethylene			1.00
•	Ethylene glycol	,		0.95
i — —	Ethylene oxide			0.017

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year		
UNF 0002 UNF02	Ethyleneimine	1.00				
	Ethylenethiourea					
	Formaldehyde			0.12		
	Glycol ethers (Table 51.1)	-		0.56		
	Glycol ethers (Table 51.3)			1.00		
	Heptachlor			1.00		
	Hexachlorobenzene			0.41		
•	Hexachlorobutadiene			0.012		
	Hexachlorocyclopentadiene			1.00		
	Hexachloroethane			0.34		
	Hexamethylene diisocyanate			1.00		
	Hexamethylphosphoramide			1.00		
	Hydrazine			0.012		
	Hydrochloric acid			5.54		
	Hydrofluoric acid			0.03		
	Hydrogen cyanide			0.38		
	Hydrogen sulfide			0.49		
	Hydroquinone			1.00		
	lodomethane			1.00		
	Isophorone			1.00		
	Lead compounds			0.08		
	Lindane			1.00		
	Maleic anhydride			0.03		
	Manganese (and compounds)			0.08		
	Mercury (and compounds)			0.012		
	Methanol			1.00		
	Methoxychlor	-		1.00		
	Methyl Isocyanate			1.00		
•	Methyl Tertiary Butyl Ether			1.00		
	Methyl bromide			1.00		
	Methyl chloride			0.89		
	Methyl ethyl ketone			1.00		
	Methyl isobutyl ketone	:		0.02		

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
NF 0002 NF02	Methyl methacrylate		······································	1.00
	Methylene diphenyl diisocyanate			1.00
•	Monomethyl hydrazine		· .	1.00
	N,N-Diethyl aniline	· · · · · · · · · · · · · · · · · · ·		1.00
	N,N-dimethylbenzenamine			1.00
0.7	N-Nitroso-N-Methylurea		~	1.00
	N-Nitrosodimethylamine		·····-	1.00
	N-Nitrosomorpholine			1.00
	Naphthalene (and Methyl naphthalenes)			0.60
	Nickel (and compounds)	J		0.038
A.	Nitric acid			0.14
	Nitrobenzene			0.19
	Parathion		· · · · · · · · · · · · · · · · · · ·	1.00
.*	Pentachloronitrobenzene			1.00
	Phenol			0.18
	Phosgene			0.014
	Phosphine			1.00
	Phosphorus, Total (as P)			1.00
	Phthalic Anhydride			0.19
-	Polychlorinated biphenyls			1.00
	Polynuclear Aromatic Hydrocarbons		:	0.012
	Propionaldehyde			0.34
	Propoxur		· · · · · · · · · · · · · · · · · · ·	1.00
	Propylene			1.00
	Propylene oxide			0.34
	Propylenimine			1.00
•	Pyridine			0.56
	Pyrocatechol		*	1.00
	Quinoline		1	1.00
	Quinone			1.00
•	Selenium (and compounds)		-	0.056
	Styrene			0.60
	Sulfuric acid			42.36

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Tetrachloroethylene	<del></del>	!	0.64
•	Titanium tetrachloride			1.00
	Toluene			1.01
	Toluene-2,4-diisocyanate	:		0.012
	Toluene-2,6-Dilsocyanate			0.012
	Toxaphene			1.00
	Trichloroethylene			0.43
	Triethyl amine			1.00
	Trifluralin			1.00
	Urethane			1.00
	Vinyl acetate			0.63
	Vinyl bromide			1.00
•	Vinyl chloride			0.11
	Vinylidene chloride			0.58
	Xylene (mixed isomers)			1.01
	Zinc (and compounds)			0.22
	alpha-Chloroacetophenone			1.00
	beta-Propriolactone			1.00
	bis(2-ethylhexyl)phthalate			1.00
	bis(Chloromethyl)ether			1.00
	n-Hexane			1.01
	n-butyl alcohol			1.00
	o-Aminoanisole			1.00
	o-dianisidine			1.00
	ortho-Tolidine			1.00
	ortho-Toluidine			1.00
	p,p'-DDE			1.00
	para-Phenylenediamine			1.00
	pentachloro-Phenol			1.00

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

#### **Emission Rates Notes:**

PCS 0001 1,1,1-Trichloroethane Tons/Year

Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)

Which Months: All Year

PCS	0001	1,1,2,2- Tetrachloroethan e	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,1,2- Trichloroethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,1- Dichloroethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,1- Dimethylhydrazin e	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,2,4- Trichlorobenzene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,2-Dibromo-3- chloropropane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,2- Dibromoethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,2- Dichloroethane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,2- Dichloropropane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,2- Diphenylhydrazin e	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,2-Epoxybutane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,2- Epoxyethylbenze ne	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,2-Oxathiolane 2,2-dioxide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,3-Butadiene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,3- Dichloropropene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,4- Dichlorobenzene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	1,4-Dioxane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2,2'- dichlorodiethyleth er	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2,2,4- Trimethylpentane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2,4,5- Trichlorophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2,4,6- Trichlorophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2,4- Dichlorophenoxy acetic Acid	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2,4-Dinitrophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2,4-Dinitrotoluene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2,4-Toluene diamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2,6-Dinitrotoluene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2- Acetylaminofluor ene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0001	2-nitro-Propane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS (	0001	3,3'- Dichlorobenzidin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS (	0001	e 4,4'- Methylenebis-(2-	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year

	A. (			
PCS 0001 PCS 0001	Chloroaniline) 4,4'- Methylenebisben	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	II
PCS 0001	zeneamine 4,6 Dinitro-o- cresol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	.ll
PCS 0001	4-Aminodiphenyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	11
PCS 0001	4- Dimethylaminoaz	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	11
PCS 0001	obenzene 4-Nitrobiphenyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	П
PCS 0001	4-Nitrophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	H
PCS 0001	Acetaldehyde	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Acetamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	.11
PCS 0001	Acetonitrile	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Acetophenone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	Ш
PCS 0001	Acrolein	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Acrylamide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Acrylic acid	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Acrylonitrile	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Allyl chloride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Amiben	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	.11
PCS 0001	Ammonia	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Aniline	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Benzene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Benzidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	dl
PCS 0001	Benzotrichloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	dl
PCS 0001	Benzyl chloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	4H
PCS 0001	Biphenyl	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Bromoform	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	di.
PCS 0001	Butene (mixed isomers)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	di
PCS 0001	Calcium cyanamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	dl
PCS 0001	Captan	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	dl
PCS 0001	Carbaryl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	dl
PCS 0001	Carbon disulfide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Carbon	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	tetrachloride Carbonyl sulfide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS 0001	Chlordane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: A Year	di
PCS_0001	Chlorine dioxide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

	0001 0001	Chloroacetic acid	Tons/Year		Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCŚ	0001	Chlorobenzene	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All	
PCS	0001	Chloroethane	Tons/Year		Year Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	
PCS	0001	Chloroform	Tons/Year		Which Months: All Year Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	
PCS	0001	Chloromethyl methyl ether	Tons/Year		Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Chloroprene	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Cresol	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Cumene	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Cyanide compounds	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Diaminotoluene (mixed isomers)	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Diazomethane	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Dibutyl phthalate	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Dichloromethane	Tons/Year		Which Months: All Year  Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)  Which Months: All Year	
PCS	0001	Dichlorvos	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Diethanolamine	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Diethyl Sulfate	Tons/Year	-	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Dimethyl formamide	Tons/Year	21	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Dimethyl phthalate	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Dimethyl sulfate	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Dimethylcarbamo yl chloride	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Epichlorohydrin	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Ethyl 4,4'- Dichlorobenzilate	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Ethyl Acrylate	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Ethyl benzene	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Ethylene	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Ethylene glycol	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Ethylene oxide	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Ethyleneimine	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Ethylenethiourea	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Formaldehyde	Tons/Year	100	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Glycol ethers (Table 51.1)	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Glycol ethers (Table 51.3)	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Heptachlor	Tons/Year		Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Hexachlorobenze	Tons/Year		Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	

	0001 0001	ne Hexachlorobutadi ene	Tons/Year	Which Months: All Year Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in twhich Months: All Year	his process)
PCS	0001	Hexachlorocyclop entadiene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Hexachloroethan e	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	his process)
· PCS	0001	Hexamethylene diisocyanate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Hexamethylphos phoramide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Hydrazine	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	his process)
PCS	0001	Hydrofluoric acid	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	his process)
PCS	0001	Hydrogen cyanide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	his process)
	0001 0001	Hydrogen sulfide Hydroquinone	Tons/Year Tons/Year	Annual rate conservatively set at 20 lbs/yr to keep total emissions < MER. Which Mannual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	lonths: All Year Which Months: All
PCS	0001	lodomethane	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Isophorone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Lindane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Maleic anhydride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	his process)
PCS	0001	Methanol	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	his process)
PCS	0001	Methoxychlor	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Methyl Isocyanate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Methyl Tertiary Butyl Ether	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Methyl bromide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	Methyl chloride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	his process)
PCS	0001	Methyl ethyl ketone	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	his process)
PCS	0001	Methyl isobutyl ketone	Tons/Year	To remain under 10 tpy sitewide, allotted 20 lbs/y Which Months: All Year	
PCS	0001	Methyl methacrylate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	his process)
PCS	0001	Methylene diphenyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	diisocyanate Monomethyl hydrazine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	N,N-Diethyl aniline	Avg lb/hr	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001 .	N,N- dimethylbenzena	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	mine N-Nitroso-N- Methylurea	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	N- Nitrosodimethyla	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	mine N- Nitrosomorpholin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0001	e Naphthalene (and Methyl naphthalenes)	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in tWhich Months: All Year	his process)
PCS	0001	Nitric acid	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in t	his process)

	0001 0001	Nitrobenzene	Tons/Year	Which Months: All Year . Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	
PCS	0001	Parathion	Tons/Year	Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All	
PCS	0001	Pentachloronitrob	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All	,
PCS	0001	enzene Phenol	Tons/Year	Year Annual rate is minimum of [(10% of (MER - CVAL emissions), 1000 lbs/yr, total VOC TAPs for sources in	
PCS	0001	Phosgene	Tons/Year	this process) Which Months: All Year Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	
PCS	0001	Phosphine	Tons/Year	Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All	
PCS	0001	Phosphorus,	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All	
PCS	0001	Total (as P) Phthalic Anhydride	Tons/Year	Year Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Polychlorinated biphenyls	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	٠
PCS	0001	Polynuclear Aromatic	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Hydrocarbons Propionaldehyde	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	\$
PCS	0001	Propoxur	Tons/Year	Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All	
PCS	0001	Propylene	Tons/Year	Year  Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	٠.
PCS	0001	Propylene oxide	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Propylenimine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Pyridine	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Pyrocatechol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Quinoline	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	٠
PCS	0001	Quinone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Styrene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Tetrachloroethyle ne	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	,	Titanium tetrachloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Toluene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS		Toluene-2,4- diisocyanate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	4
PCS		Toluene-2,6- Diisocyanate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS		Toxaphene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Toxic air pollutants (TAP)	Tons/Year	Overall limit on total TAPs for the process. The sum of individual TAP limits is greater than this limit (for operational flexibility) but the overall limit cannot be exceeded. Annual rate is a cap on total toxic air pollutants (TAPs) for this process. Total TAPs for the Sulfuric Acid Plant are limited to 8.92 tpy which is the sum of PSC001 TAP cap, PSC0002 TAP cap, individual TAP limits on other sources, and GCVXII TAPs Which Months: All Year	
PCS	0001	Trichloroethylene	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Triethyl amine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	٠.
PCS	0001	Trifluralin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Urethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0001	Vinyl acetate	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	•
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Al ID: 1314 - Rhodia Inc

Activity Number: PER20100009
Permit Number: 0840-00033-V3
Air - Title V Regular Permit Major Mod

PCS 0001 PCS 0001	Vinyl bromide	Tons/Year	Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	Vinyl chloride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	his process)
PCS 0001	Vinylidene chloride	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	his process)
PCS 0001	Xylene (mixed isomers)	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	his process)
PCS 0001	alpha- Chloroacetophen	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	one beta- Propriolactone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	bis(2- ethylhexyl)phthal	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	ate bis(Chloromethyl) ether	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	n-Hexane	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0001	n-butyl alcohol	Tons/Year	Annual rate is minimum of (10% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0001	o-Aminoanisole	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	o-dianisidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	ortho-Tolidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	ortho-Toluidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	p,p'-DDE	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	para- Phenylenediamin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0001	pentachloro- Phenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	
PCS 0002	1,1,1- Trichloroethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	
PCS 0002	1,1,2,2- Tetrachloroethan	Tons/Year	Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0002	e 1,1,2- Trichloroethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0002	1,1- Dichloroethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	1,1- Dimethylhydrazin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	e 1,2,4-	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	Trichlorobenzene 1,2-Dibromo-3-	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	chloropropane 1,2- Dibromoethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0002	1,2- Dichloroethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0002	1,2-	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0002	Dichloropropane 1,2- Diphenylhydrazin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	e 1,2-Epoxybutane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0002	1,2- Epoxyethylbenze	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
	ne			

PCS	0002	1,2-Oxathiolane 2,2-dioxide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0002	1,3-Butadiene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	nis process)
PCS	0002	1,3- Dichloropropene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	nis process)
PCS	0002	1,4- Dichlorobenzene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	nis process)
PCS	0002	1,4-Dioxane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	nis process)
PCS	0002	2,2'- dichlorodiethyleth er	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	nis process)
PCS	0002	2,2,4- Trimethylpentane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0002	2,4,5- Trichlorophenol	Tons/Year	Annual III to the company of the com	Which Months: All
PCS	0002	2,4,6- Trichlorophenol	Tons/Year	Amenda to the company of the company	Which Months: All
PCS	0002	2,4- Dichlorophenoxy acetic Acid	Tons/Year	Associated to the company of the com	Which Months: All
PCS	0002	2,4-Dinitrophenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0002	2,4-Dinitrotoluene	Tons/Year	Annual rate is minimum of (65% of MER, 1000 lbs/yr, total VOC TAPs for sources in th Which Months: All Year	is process)
PCS	0002	2,4-Toluene diamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS	0002	2,6-Dinitrotoluene	Tons/Year	Annual rate is minimum of (65% of MER, 1000 lbs/yr, total VOC TAPs for sources in th Which Months: All Year	is process)
PCS	0002	2- Acetylaminofluor ene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0002	2-nitro-Propane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in th Which Months: All Year	is process)
PCS	0002	3,3'- Dichlorobenzidin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0002	e 4,4'- Methylenebis-(2- Chloroaniline)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0002	4,4'- Methylenebisben zeneamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0002	4,6 Dinitro-o- cresol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PÇS	0002	4-Aminodiphenyl	Tons/Year	Annual sets to set to the sets of the sets	Which Months: All
PCS	0002	4- Dimethylaminoaz obenzene	Tons/Year	A 3 Lt tt August a company to the co	Which Months: All
PCS	0002	4-Nitrobiphenyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS	0002	4-Nitrophenol	Tons/Year	Appropriate to extract the contract of the con	Which Months: All
PCS	0002	Acetaldehyde	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in thi Which Months: All Year	s process)
PCS	0002	Acetamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) V	Vhich Months: All
PCS	0002	Acetonitrile	Tons/Year	Year Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this Which Months: All Voca-	s process)
PCS	0002	Acetophenone	Tons/Year	Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) V Year	Vhich Months: All
PCS	0002	Acrolein	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this Which Months: All Year	s process)
PCS	0002	Acrylamide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this Which Months: All Year	s process)
PCS	0002	Acrylic acid	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this	s process)

			NOTE IN THE SHAWARE
PCS 0002 PCS 0002	Acrylonitrile	Tons/Year	Which Months: All Year Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Allyl chloride	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Amiben	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Ammonia	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Aniline	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Benzene	Tons/Year	Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
PCS 0002	Benzidine	Tons/Year	Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All
PCS 0002	Benzotrichloride	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All
PCS 0002	Benzyl chloride	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All
PCS 0002	Biphenyl	Tons/Year	Year Annual rate is minimum of (70% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
PCS 0002	Bromoform	Tons/Year	Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All
PCS 0002	Butene (mixed	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All
PCS 0002	isomers) Calcium	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All
PCS 0002	cyanamide Captan	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All
PCS 0002	Carbaryl	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All
PCS 0002	Carbon disulfide	Tons/Year	Year Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
PCS 0002	Carbon	Tons/Year	Which Months: All Year  Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
PCS 0002	tetrachloride Carbonyl sulfide	Tons/Year	Which Months: All Year Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)
PCS 0002	Chlordane	Tons/Year	Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All
PCS 0002	Chlorinated	Tons/Year	Year Stack test data on Unit 1 and Unit Which Months: All Year
	Dibenzo-P- Dioxins		The second secon
PCS 0002	Chlorinated dibenzofurans	Tons/Year	Stack test data on Unit 1 and Unit 2 Which Months: All Year
PCS 0002	Chlorine dioxide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Chloroacetic acid	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Chlorobenzene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Chloroethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Chloroform	Tons/Year	Annual rate is minimum of (70% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Chloromethyl methyl ether	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Chloroprene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Cresol	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Cumene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Cyanide compounds	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Diaminotoluene (mixed isomers)	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS 0002	Diazomethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009

Permit Number: 0840-00033-V3 Air - Title V Regular Permit Major Mod

PCS	0002	Dibutyl phthalate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Dichloromethane	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Dichlorvos	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Diethanolamine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Diethyl Sulfate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Dimethyl formamide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Dimethyl phthalate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Dimethyl sulfate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Dimethylcarbamo yl chloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Epichlorohydrin	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Ethyl 4,4'- Dichlorobenzilate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Ethyl Acrylate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Ethyl benzene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Ethylene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Ethylene glycol	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Ethylene oxide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Ethyleneimine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Ethylenethiourea	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Formaldehyde	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Glycol ethers (Table 51.1)	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Glycol ethers (Table 51.3)	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Heptachlor	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Hexachlorobenze ne	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Hexachlorobutadi ene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Hexachlorocyclop entadiene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Hexachloroethan e	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Hexamethylene diisocyanate	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Hexamethylphos phoramide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Hydrazine	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Hydrofluoric acid	Tons/Year	Annual rate is minimum of (75% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS	0002	Hydrogen cyanide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS PCS		Hydrogen sulfide Hydroquinone	Tons/Year Tons/Year	Annual rate conservatively set at 80 lbs/yr to keep total emissions < MFR Which Months: All Year
PCS		Iodomethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
PCS		Isophorone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year
. 55			, onor rear	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All

PCS 0 PCS 0		Lindane	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	Maleic anhydride	Tons/Year	Annual rate is minimum of (70% of MER, 1000 lbs/yr, total VOC TAPs for sources in t Which Months: All Year	his process)
PCS 0	0002	Methanol	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in t Which Months: All Year	this process)
PCS 0	0002	Methoxychlor	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	Methyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	Isocyanate Methyl Tertiary	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	Butyl Ether Methyl bromide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	Methyl chloride	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in t Which Months: All Year	this process)
PCS 0	0002	Methyl ethyl	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in the Which Months: All Year	this process)
PCS 0	0002	ketone Methyl isobutyl	Tons/Year	To remain under 10 tpy sitewide, allotted 20 lbs/yr Which Months: All Year	• •
PCS 0	0002	ketone Methyl	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0	0002	methacrylate Methylene diphenyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	diisocyanate Monomethyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	hydrazine N,N-Diethyl	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	aniline N,N- dimethylbenzena	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	mine N-Nitroso-N-	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	Methylurea N- Nitrosodimethyla	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	mine N- Nitrosomorpholin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	e Naphthalene (and Methyl	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year $$	this process)
PCS 0	0002	naphthalenes) Nitric acid	Tons/Year	Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0	0002	Nitrobenzene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0	0002	Parathion	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0	0002	Pentachloronitrob	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0	0002	enzene Phenol	Tons/Year	Year Annual rate is minimum of [(85% of (MER - CVAL emissions), 1000 lbs/yr, total VOC this process) Which Months: All Year	TAPs for sources in
PCS 0	0002	Phosgene	Tons/Year	Annual rate is minimum of (80% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0	0002	Phosphine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0	0002	Phosphorus,	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0	0002	Total (as P) Phthalic	Tons/Year	Year Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS 0	0002 ,	Anhydride Polychlorinated	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0	0002	biphenyls Polynuclear Aromatic	Tons/Year	Year Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in Which Months: All Year	this process)
PCS-0	0002	Hydrocarbons Propionaldehyde	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in	this process)

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3

Air - Title V Regular Permit Major Mod

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	0002 0002	Propoxur	Tons/Year	Which Months: All Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Mont Year	hs: All
PCS	0002	Propylene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Mont Year	hs: All
PCS	0002	Propylene oxide	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0002	Propylenimine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Mont Year	hs: All
PCS	0002	Pyridine	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0002	Pyrocatechol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Mont Year	hs: All
PCS	0002	Quinoline	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Monti	hs: All
PCS	0002	Quinone	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Monti Year	hs: All
PCS	0002	Styrene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0002	Tetrachloroethyle	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0002	Titanium tetrachloride	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Montl Year	hs: All
PCS	0002	Toluene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0002	Toluene-2,4- diisocyanate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0002	Toluene-2,6- Diisocyanate	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	,
PCS	0002	Toxaphene	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Month Year	ns: All
PCS	0002	Toxic air pollutants (TAP)	Tons/Year	Overall limit on total TAPs for the process. The sum of individual TAP limits is greater than this limit operational flexibility) but the overall limit cannot be exceeded. Annual rate is a cap on total toxic a	t (for
		· ·		pollutants (TAPs) for this process. Total TAPs for the Sulfuric Acid Plant are limited to 8.92 toy white	ch is
				the sum of PSC001 TAP cap, PSC0002 TAP cap, individual TAP limits on other sources, and GCV. TAPs Which Months: All Year	XII
PCS	0002	Trichloroethylene	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0002	Triethyl amine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Month Year	ıs: All
PCS	0002	Trifluralin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Month Year	ıs: All
PCS	0002	Urethane	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Month Year	ns: All
PCS	0002	Vinyl acetate	Tons/Year.	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	* *
PCS	0002	Vinyl bromide	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Month Year	ıs: All
PCS		Vinyl chloride	Tons/Year.	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0002	Vinylidene chloride	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months; All Year	*
PCS	0002	Xylene (mixed isomers)	Tons/Year	Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
PCS	0002	alpha- Chloroacetophen	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Month Year	s: All
PCS	0002	one beta- Proprielectore	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Month	s: Ali
PCS	0002	Propriolactone bis(2- ethylhexyl)phthal	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Month Year	s: All
PCS	0002		Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Which Month	s: All
PCS	0002	ether n-Hexane	Tons/Year	Year Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process)	
PCS	0002	n-butyl alcohol	Tons/Year	Which Months: All Year Annual rate is minimum of (85% of MER, 1000 lbs/yr, total VOC TAPs for sources in this process) Which Months: All Year	
				Which Months: All Year	•

PCS 0002	o-Aminoanisole	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0002	o-dianisidine	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	ortho-Tolidine	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0002	ortho-Toluidine	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process)	Which Months: All
PCS 0002	p,p'-DDE	Tons/Year	Year Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	para- Phenylenediamin	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All
PCS 0002	e pentachloro- Phenol	Tons/Year	Annual rate is minimum of (1000 lbs/yr, total VOC TAPs for sources in this process) Year	Which Months: All



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#### Group: PCS 0001 Spent Acid Process

Group Members: ARE 0002 CRG

CRG 0004

EQT 0008EQT 0150EQT 0151EQT 0161EQT 0163EQT 0164EQT 0165EQT 0167EQT 0168EQT 0169EQT 0171EQT 0176EQT 0185EQT 0277FUG 0002

#### ARE 0002 M4 - West End Sump

1 [LAC 33:III.5107.A.2]

Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33;III.5105.B.

#### CRG 0003 CRG003 - Spent Acid Tanks

Group Members: EQT 0008 EQT 0161 EQT 0163 EQT 0164 EQT 0165 EQT 0169 EQT 0171

2	[40 CFR 60.110b(e)]	Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e),
		(f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
3	[40 CFR 65.145(c)(2)]	Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent
		(Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
		Which Months: All Year Statistical Basis: None specified
4	[40 CFR 65.42(b)(5)]	Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet
		emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction.
		Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
5	[40 CFR 65.47(b)]	Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of
		the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40]
		CFR 65.47(b)]

#### CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

Group Members: EQT 0167 EQT 0168

6	40 CFR 60.110b(e)]	Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e),
		(f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
7	40 CFR 65.145(c)(2)]	Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent
		(Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
	10 Marie 14	Which Months: All Year Statistical Basis: None specified
8	40 CFR 65.42(b)(5)]	Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet
		emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction.
	ANA STATE OF THE S	Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
9	40 CFR 65.47(b)]	Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of
		the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40]
•	1	CFR 65.47(b)]

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### Group: PCS 0001 Spent Acid Process

#### CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

10	[LAC 33:III.501.C.6]
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The requirements listed under CRG004 for the 99/Oleum/Spent Swing Tanks (EQT167 & EQT168) only apply when these tanks are in Spent Acid Service.

### EQT 0150 26 - Spent Acid Barge Loading Scrubber

		3
11	[LAC 33:III.501.C.6]	pH monitored by pH instrument once every four hours when barge vent are routed to scrubber. STATE ONLY.
12	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: None specified The requirements listed for EQT 0150 (Source 26) only apply when portable scrubber Industrial Field Service (IFS) Unit 1 is being used. Permittee may substitute IFS Unit 4 (Permit No. 7777-00314-01) or IFS Unit 6 (Permit No. 7777-00413-00) and follow the monitoring
13	[LAC 33:III.501.C.6]	requirements for those scrubbers required by their respective permits. STATE ONLY.  Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
14	[LAC 33:III.501.C.6]	pH recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
15	[LAC 33:III.501.C.6]	Packed Column Spray Nozzle Pressure >= 15 psig when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY.
16	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: Four-hour average Pressure monitored by pressure instrument once every four hours when barge vents are routed to scrubber. STATE ONLY. Which Months: All Year Statistical Basis: None specified
17	[LAC 33:III.501.C.6]	Pressure recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
18	[LAC 33:III.501.C.6]	pH >= 10 s.u. when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY. Which Months: All Year Statistical Basis: Four-hour average
19	[LAC 33:III.5107.A.2]	Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. STATE ONLY.

### EQT 0151 27 - Acid Plant Vapor Combustor

20 [40 CFR 65.145(a)]	Temperature >= 1512 F when regulated tanks are venting to the APVC; or VOC, Total >= 95 % destruction removal efficiency (DRE) when
	calculated by time-weighted average factoring in the amount of time vented to Sulfuric Acid Unit No. 1 (RLP 014). Subpart G. [40 CFR 65.145(a)]
	Which Months: All Year Statistical Basis: Daily average
21 [40 CFR 65.145(a)]	The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]

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### Group: PCS 0001 Spent Acid Process

	27 - Acid Plant Vapor Combust	
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22 [40 CFR 65.145(c)(1)]	Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65. Subpart G. [40 CFR 65.145(c)(1)]
23 [40 CFR 65.145(c)(2)]	Temperature monitored by temperature monitoring device at the approved frequency. Monitor the firebox temperature. Subpart G. [40 CFR 65.145(c)(2)] Which Months: All Year Statistical Basis: Daily average
24 [40 CFR 65.163]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
25 [40 CFR 65.5(c)]	Submit Startup, Shutdown, and Malfunction Report: Due by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate), unless the information is submitted with the periodic report. Include the information specified in 40 CFR 65.6(c)(1) through (c)(4), as appropriate. Subpart A. [40 CFR 65.5(c)]
26 [40 CFR 65.5(e)]	Submit Periodic Report: Due semiannually, no later than 60 calendar days after the end of each six-month period. Include all information specified in subparts of 40 CFR 65 and in 40 CFR 65.5(f). Subpart A. [40 CFR 65.5(e)]
27 [40 CFR 65.6(b)(1)]	Develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the regulated source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Address routine or otherwise predictable CPMS malfunctions. Develop the plan by the regulated source's implementation date as specified in 40 CFR 65.1(f), or for sources referenced from 40 CFR 63 Subpart F, by the compliance date specified in 40 CFR 63 Subpart F. Subpart A. [40 CFR 65.6(b)(1)]
28 [LAC 33:III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  Which Months: All Year Statistical Basis: None specified
29 [LAC 33:III.1311.C]	Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  Which Months: All Year Statistical Basis: Six-minute average
30 [LAC 33:111.5107.A.2]	Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
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#### EQT 0176 20D120/30D240 - IFS Mix Tank

31 [LAC 33:III.2103.A]	Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure
1 1 1 1 1	greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
32 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

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### Group: PCS 0001 Spent Acid Process

#### EQT 0176 20D120/30D240 - IFS Mix Tank

33 [LAC 33:III.5107.A.2]

Emits Class I and/or Class II and/or Class III TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### EQT 0185 M7 - 001 Wastewater Treatment Unit

34 [LAC 33:III.5107.A.2]

Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### EQT 0277 13 - Acid Plant Caustic Scrubber

35	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
36	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device continuously only when venting to scrubber. STATE ONLY. Which Months: All Year Statistical Basis: Four-hour average
37	[LAC 33:III.501.C.6]	Flow rate >= 315 gallons/min when venting to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
38	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
39	[LAC 33:III.501.C.6]	pH recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
40	[LAC 33:III.501.C.6]	pH monitored by pH instrument continuously only when venting to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
41	[LAC 33:III.501.C.6]	pH >= 7 s.u. when venting to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
42	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
43	[LAC 33:III.905]	Install air pollution control facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities whenever proctically, occarringly, and tasked by the facilities of the facilities whenever proctically and the facilities whenever proctically and the facilities of the facilities whenever proctically and the facilities of the faciliti
	•	Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a
	•	property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the
	·	facilities, even though the ambient air quality standards in affected areas are not exceeded.

#### FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

44 [40 CFR 65.143(a)(1)]	Ensure that each closed vent system is designed and operated to collect the regulated material vapors from the emission point and to route the
45 - [40 CPD (5 +42/ )(2)]	collected vapors to a control device. Subpart G. [40 CFR 65.143(a)(1)]
45 [40 CFR 65.143(a)(2)]	Operate closed vent systems at all times when emissions are vented to them. Subpart G. [40 CFR 65.143(a)(2)]

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## Group: PCS 0001 Spent Acid Process

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FUG	0002 FUG-ACID - Acid P	lant Fugitive Emissions
46	[40 CFR 65.143(a)(3)(ii)]	Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. Subpart G. [40 CFR 65.143(a)(3)(ii)]  Which Months: All Year Statistical Basis: None specified
47	[40 CFR 65.143(a)(3)(ii)]	Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart G. [40 CFR 65.143(a)(3)(ii)]
48	[40 CFR 65.143(b)(1)(i)(A)]	Closed vent system (hard piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency, as specified in 40 CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(i)(A)] Which Months: All Year Statistical Basis: None specified
49	[40 CFR 65.143(b)(1)(i)(B)]	Closed vent system (hard piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 65.143(b)(1)(i)(B)] Which Months: All Year Statistical Basis: None specified
50	[40 CFR 65.143(b)(1)(ii)]	Closed vent system (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, as specified in 40 CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(ii)] Which Months: All Year Statistical Basis: None specified
51	[40 CFR 65.143(b)(2)(i)]	Closed vent system (unsafe to inspect): Determine that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with 40 CFR 65.143(b)(1). Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(i)]
52	[40 CFR 65.143(b)(2)(ii)]	Closed vent system (unsafe to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-monitor times but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(ii)] Which Months: All Year Statistical Basis: None specified
53	. [40 CFR 65.143(b)(3)(i)]	Closed vent system (difficult to inspect): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(i)]
54	[40 CFR 65.143(b)(3)(ii)]	Closed vent system (difficult to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(ii)]  Which Months: All Year Statistical Basis: None specified
55	[40 CFR 65.143(d)(1)]	Closed vent system: Eliminate indications of a leak, or monitor the equipment according to the provisions in 40 CFR 65.143(c), if there are visible, audible or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 65.143(b)(1)(i)(B). Subpart G. [40 CFR 65.143(d)(1)]
56	[40 CFR 65.143(d)(2)]	Closed vent system: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later, except as

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specified in 40 CFR 65.143(d)(3). Subpart G. [40 CFR 65.143(d)(2)]

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### Group: PCS 0001 Spent Acid Process

### FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

57 [40 CFR 65.143(d)(3)]	Closed vent system: Complete repairs as soon as practical, but not later than the end of the next closed vent system shutdown, if repair of a leak is technically infeasible without a closed vent system shutdown, or if it is determined that emissions from immediate repair would be greater than
	the emissions likely to result from delay of repair. Subpart G. [40 CFR 65.143(d)(2)]

58 [40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.

Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### Group: PCS 0002 TS Process

59 [LAC 33:III.1513.C]

60 [LAC 33:III.5107.A.2]

Group Members: ARE 0003 CRG EQT 0147EQT 0177EQT 0178EQT 0179EQT 0180EQT 0181EQT 0182EQT 0183EQT 0278EQT 0279EQT 0280EQT 0281EQT 0282EQT 0283EQT 0284 CRG 0002 FUG 0003 RLP 0013 RLP 0014

### ARE 0003 M3 - Treatment Services Sumps

61 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:HI.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

### CRG 0001 CRG001 - 40D250, 40D280, and 40D200

Group Members: EQT 0177EOT 0178EOT 0180

62 [40 CFR 60.112b(a)(3)(i)]	Closed vent system: Design to collect all VOC vapors and gases discharged from the storage vessel. Subpart Kb. [40 CFR 60.112b(a)(3)(i)]
63 [40 CFR 60.112b(a)(3)(ii)]	VOC Total >= 95 % raduation officiones union a classical designation in the storage vesser. Subpart Rb. [40 CFR 60.112b(a)(3)(1)]
	VOC, Total >= 95 % reduction efficiency using a closed vent system and control device. Sulfuric Acid Unit No. 2 serves as the primary control device for those teals. The TS No. 2
	device for these tanks. The TS Vapor Combustor serves as the secondary control device for these tanks. Subpart Kb. [40 CFR
	60.112b(a)(3)(ii)]
64 [40 CED 60 1161 (1)]	Which Months: All Year Statistical Basis: None specified
64 [40 CFR 60.116b(b)]	Equipment/operational data record/seeping by electronic or hard convenent would be a seen as a second seeping by electronic or hard convenent would be a seen as a second seeping by electronic or hard convenent would be a seen as a second seeping by electronic or hard convenent would be a seen as a second seeping by electronic or hard convenent would be a second seeping by the second seeping by the second seeping by the second seeping by the second seeping by the second seeping by the second seeping by the second seeping by the secon

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Keep copies of all records for the life of the source as specified by 40 CFR 60.116b(a). Subpart Kb. [40 CFR 60.116b(b)]

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### Group: PCS 0002 TS Process

CKG	0001 CRG001 - 40D250,	400200, and 400200
65	[40 CFR 61.343(a)(1)(i)(A)]	Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
66	[40 CFR 61.343(a)(1)(i)(B)]	Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
67	[40 CFR 61.343(a)(1)]	Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
68	[40 CFR 61.343(c)]	Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)] Which Months: All Year Statistical Basis: None specified
69	[40 CFR 61.343(d)]	Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
70	[40 CFR 61.349(a)(1)(iii)]	Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
71	[40 CFR 61.355]	Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
72	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
73	[40 CFR 63.133(a)(2)(i)]	Operate and maintain a fixed roof and a closed-vent system that routes the organic hazardous air pollutants vapors vented from the wastewater tank to a control device. Subpart G. [40 CFR 63.133(a)(2)(i)]
74	[40 CFR 63.133(b)(1)(i)]	Fixed roof: Maintain in accordance with the requirements specified in 40 CFR 63.148, except as provided in 40 CFR 63.133(b)(4). Subpart G. [40 CFR 63.133(b)(1)(i)]
75	[40 CFR 63.133(b)(1)(ii)]	Fixed roof: Maintain each opening in a closed position at all times that the wastewater tank contains a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream except when it is necessary to use the opening for wastewater sampling, removal, or for equipment inspection, maintenance, or repair. Subpart G. [40 CFR 63.133(b)(1)(ii)]
76	[40 CFR 63.133(f)]	Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]  Which Months: All Year Statistical Basis: None specified
77	[40 CFR 63.133(g)]	Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]  Which Months: All Year Statistical Basis: None specified
78	[40 CFR 63.143(a)]	Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]

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### Group: PCS 0002 TS Process

### CRG 0001 CRG001 - 40D250, 40D280, and 40D200

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79 [LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
80 [LAC 33:HI.2103.E]	Which Months: All Year Statistical Basis: None specified  Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor
81 [LAC 33:HI.2103.H.2] 82 [LAC 33:HI.2103.I]	disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place. Routed to Sulfuric Acid Unit No. 2 or TS Vapr Combustor.  Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.  Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

### CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220

### Group Members: EQT 0179 EQT 0181 EQT 0182 EQT 0183

83	[40 CFR 61.343(a)(1)(i)(A)]	Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading
	[10 CVP (1 2 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
84	[40 CFR 61.343(a)(1)(i)(B)]	Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
85	[40 CFR 61.343(a)(1)]	Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
86	[40 CFR 61.343(c)]	Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)] Which Months: All Year Statistical Basis: None specified
87	[40 CFR 61.343(d)]	Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
88	[40 CFR 61.349(a)(1)(iii)]	Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
89	[40 CFR 61.355]	Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
90	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
19	[40 CFR 63.133(a)(1)]	Operate and maintain a fixed roof. Subpart G. [40 CFR 63.133(a)(1)]

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CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220			
92	[40 CFR 63.133(f)]	Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]	
93 94	[40 CFR 63.133(g)]	Which Months: All Year Statistical Basis: None specified Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]  Which Months: All Year Statistical Basis: None specified Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]	
95	•	Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.	
96	[LAC 33:III.2103.H.3] [LAC 33:III.2103.I]	If required, Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.  Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.	

### EQT 0147 21 - TS Vapor Combustor

98	[40 CFR 60.112b(a)(3)(ii)]	VOC, Total >= 95 % reduction efficiency using a closed vent system and control device. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)] Which Months: All Year Statistical Basis: Three-hour average
99	[40 CFR 60.113b(c)(2)]	Equipment/operational data monitored by the regulation's specified method(s) at the regulation's specified frequency. Monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
		Which Months: All Year Statistical Basis: None specified
100	[40 CFR 60.115b(c)(1)]	Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
101	[40 CFR 60.115b(c)(2)]	Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2). Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]
102	[40 CFR 61.349(a)(2)(i)(C)]	Residence time >= 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F). Subpart FF. [40 CFR 61.349(a)(2)(i)(C)] Which Months: All Year Statistical Basis: None specified
103	[40 CFR 61.349(f)]	Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of
		ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
	'	Which Months: All Year Statistical Basis: None specified
104	[40 CFR 61.354(c)(1)]	Temperature monitored by temperature monitoring device continuously. Install the temperature sensor at a representative location in the combustion chamber. Subpart FF. [40 CFR 61.354(c)(1)] Which Months: All Year Statistical Basis: None specified

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## Group: PCS 0002 TS Process

### EQT 0147 21 - TS Vapor Combustor

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105	[40 CFR 61.354(c)]	Inspect the firebox temperature results daily to ensure proper operation. Subpart FF. [40 CFR 61.354(c)]
106	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two
		years from the date the information is recorded unless otherwise specified. Subpart FF.
107	[40 CFR 63.139(b)]	Ensure that the control device is operating whenever organic hazardous air pollutants emissions are vented to the control device. Subpart G. [40 CFR 63.139(b)]
108	[40 CFR 63.139(c)(1)(iii)]	Residence time >= 0.5 sec at a minimum temperature of 760 degrees C. The TS Vapor Combustor is the secondary control device for TS tanks
		that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.139(c)(1)(iii)]
	:	Which Months: All Year Statistical Basis: None specified
109	[40 CFR 63.139(d)]	Demonstrate that each control device or combination of control devices achieves the appropriate conditions specified in 40 CFR 63 130(c) by
		using one or more of the methods specified in 40 CFR 63.138(d)(1), (d)(2), or (d)(3), except as specified in (d)(4). Subpart G. [40 CFR 63.139(d)]
110	[40 CFR 63.143(e)(1)]	Comply with the monitoring requirements specified in 40 CFR 63 Subpart G Table 13. Continuously monitor the firebox temperature. Subpart G. [40 CFR 63.143(e)(1)]
111	[40 CFR 63.143(g)]	The firebox temperature monitoring equipment shall be installed, calibrated, and maintained according to manufacturer's specifications or other
		written procedures that provide adequate assurance that the equipment will monitor accurately Subpart G [40 CFR 63 143(a)]
112	[LAC 33:III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire soot blowing or lancing, charging of an incinerator
		equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute
		period in any 60 consecutive minutes.
113	[LAC 33:III.1311.C]	Which Months: All Year Statistical Basis: None specified
110	[	Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
	•	Which Months: All Year Statistical Basis: Six-minute average
114	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to
115	[[ AC 22.H[ 2102 E 11	snow annual potential sulfur dioxide emissions.
115	[LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95%. This
		limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
116	[LAC 33:III.2103.H.2]	Which Months: All Year Statistical Basis: Three-hour average  Determine compliance with I AC 33-III 2103 E using the methods in I AC 22-IVI 2102 IV 2
117	[LAC 33:III.2103.I]	Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
	• • • • • • • • • • • • • • • • • • • •	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
118	[LAC 33:III.5107.A.2]	Emits Class II TAP (via this source and process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than
	•	the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

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#### Group: PCS 0002 TS Process

#### EQT 0278 U1-Scbr - Unit 1 Tail Gas Scrubber

119 [LAC 33:III.905]

Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

#### EQT 0279 U2-Scbr - Unit 2 Tail Gas Scrubber

120 [LAC 33:11I.905]

Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

#### EQT 0280 U1-Furn - Unit 1 Furnace

121	[40 CFR 61.342(c)(1)(i)]	Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment
122	[40 CFR 61.348(e)]	system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)] Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC 33:III.507.H.1.a]
123	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
124	[40 CFR 63.138(h)(2)(i)]	Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H. Subpart G. [40 CFR 63.138(h)(2)(i)]
125	[40 CFR 65.145(a)]	The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]
126	[40 CFR 65.145(c)(1)]	Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65. Subpart G. [40 CFR 65.145(c)(1)]
127	[40 CFR 65.145(c)(1)]	Temperature >= 1500 F when spent acid tanks are venting to Sulfuric Acid Unit No. 1. Subpart G. [40 CFR 65.145(c)(1)] Which Months: All Year Statistical Basis: None specified
128	[40 CFR 65.145(c)(2)]	The owner or operator shall monitor the parameters specified in the Initial Compliance Status Report or in the operating permit. Therefore, Combustion zone temperature shall be monitored. Records shall be generated as specified in 65.163(b)(1). [40 CFR 65.145(c)(2)]
129	[40 CFR 65.163]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.

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#### EQT 0280 U1-Furn - Unit 1 Furnace

130	II.AC	33.111	1101.B1

Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: None specified

### EQT 0281 U2-RFurn - Unit 2 Regen Furnace

4.00	020 1 02-Ki um - 8mit 2	Regen Furnace
131	[40 CFR 60.112b(a)(3)(ii)]	VOC, Total >= 95 % reduction efficiency. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
	540 GPD 60 6401 6 5602	Which Months: All Year Statistical Basis: Three-hour average
132	[40 CFR 60.113b(c)(2)]	Equipment/operational data monitored by the regulation's specified method(s) continuously. Monitor the parameters of the closed vent system
		and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the
		plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature (Regen furnace) continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
		Which Months: All Year Statistical Basis: None specified
133	[40 CFR 60.115b(c)(1)]	Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control
		equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
134	[40 CFR 60.115b(c)(2)]	Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2).
	•	Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]
135	[40 CFR 61.342(c)(1)(i)]	Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment
		system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
136	[40 CFR 61.348(e)]	Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as
		indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the
		methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC
		33:111.507.H.1.a]
137	[40 CFR 61.349(a)(2)(i)(C)]	Residence time >= 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F) in the Regen furnace. Subpart FF. [40 CFR
		61.349(a)(2)(1)(C)]
120	540 CIPD (1 7 40 40 3	Which Months: All Year Statistical Basis: None specified
138	[40 CFR 61.349(f)]	Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of
	•	ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose
		connections. Subpart FF. [40 CFR 61.349(f)]
. 120	[40 CED (1.254(-)(5))	Which Months: All Year Statistical Basis: None specified
139	[40 CFR 61.354(c)(5)]	Equipment/operational data monitored by technically sound method continuously. Monitor a parameter that indicates good combustion
		operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]
140	[40 CFR 61.354(c)(5)]	Which Months: All Year Statistical Basis: None specified
140	[(0)(0)(0)(0)(0)(0)	Equipment/operational data recordkeeping by recorder continuously. Record a parameter that indicates good combustion operating practices are
		being used. Subpart FF. [40 CFR 61.354(c)(5)]

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### Group: PCS 0002 TS Process

FOT 028	R1 112	-RFurn	- Unit 2	Regen	Furnace
LG( UZ)	JI 42	-1XI UIII	- OIIII 4	176AGH	I UIIIAGE

141	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
142	[40 CFR 63.138(h)(2)(i)]	Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H. Subpart G. [40 CFR 63.138(h)(2)(i)]
143	[40 CFR 63.139(c)(1)(iii)]	Route organic hazardous air pollutant emissions to an enclosed combustion device having a minimum Residence time >= 0.5 sec at a minimum temperature of 760 degrees C. Unit No. 2 Regen furnace is the primary control device for TS tanks that are subject to vapor control per
		63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to us. Per 63.139(d)(4)(iii)(A), this unit is exempt from 63.139(d)(1)-(3) and 63.143. Subpart G. [40 CFR 63.139(c)(1)(iii)] Which Months: All Year Statistical Basis: None specified
144	[LAC 33:III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
		Which Months: All Year Statistical Basis: None specified
145	[LAC 33:111,2103.E.1]	VOC, Total >= 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95% for compliance of all tanks vented to it. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
		Which Months: All Year Statistical Basis: Three-hour average
146	[LAC 33:III.2103.H.2]	Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
147	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

#### EQT 0282 U2-SFurn - Unit 2 Sulfur Furnace

148 (L	AC 33:III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator,
		equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute
		period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: None specified

#### EQT 0283 U1-Proc - Unit 1 Process

149	[LAC 33:111.1511.E]	Sulfuric acid monitored by technically sound method daily. Monitor the H2SO4 production rate.
		Which Months: All Year Statistical Basis: None specified
150	[LAC 33:III.1513.A.3]	Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H2SO4 production rate.

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### Group: PCS 0002 TS Process

#### EQT 0283 U1-Proc - Unit 1 Process

151 [LAC 33:III.5109.A.1]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

#### EQT 0284 U2-Proc - Unit 2 Process

152 [LAC 33:III.1511.E]	Sulfuric acid monitored by technically sound method daily. Monitor the H2SO4 production rate.
153 [LAC 33:III.1513.A.3]	Which Months: All Year Statistical Basis: None specified Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H2SO4 production rate.
154 [LAC 33:III.5109.A.1]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

155	[40 CFR 60.112b(a)(3)(i)]	Closed vent system (no detectable emissions): VOC, Total < 500 ppm above background as indicated by instrument readings and visual inspections, as determined in Subpart VV, 40 CFR 60.485(c). Subpart Kb. [40 CFR 60.112b(a)(3)(i)]
		Which Months: All Year Statistical Basis: None specified
156	[40 CFR 60.112b(a)(3)]	Equip with a closed vent system and control device. Design the closed vent system to collect all VOC vapors and gases discharged from the
		storage vessel and operate with no detectable emissions. Subpart Kb. [40 CFR 60.112b(a)(3)]
157	[40 CFR 61.343(a)(1)(i)(A)]	Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading
		less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR
		61.355(h). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
158	[40 CFR 61.345(a)(1)]	Install, operate, and maintain a cover on each container used to handle, transfer, or store waste. Subpart FF. [40 CFR 61.345(a)(1)]
159	[40 CFR 61.348(e)(3)ii]	If the cover and closed-vent system operates such that the treatment process and wastewater treatment system unit are maintained at a pressure less than atmospheric pressure, the owner or operator may operate the system with an opening that is not sealed and kept closed at all times provided the opening is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmy above.
		background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h). Subpart FF. [40 CFR 61.348(e)(3)ii]
160	[40 CFR 61.349(a)(1)(i)]	Closed-vent system: Operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as
		determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.349(a)(1)(i)]
161	[40 CFR 61.349(f)]	Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of
	-	ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose
		connections. Subpart FF. [40 CFR 61,349(f)]
	•	Which Months: All Year Statistical Basis: None specified

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### Group: PCS 0002 TS Process

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

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162 [	40 CFR 61.354(f)(1)]	Closed-vent system (bypass line): Seal or closure mechanism monitored by visual inspection/determination monthly. Check the position of the valve and the condition of the car-seal or closure mechanism required under 40 CFR 61.349(a)(1)(ii) to ensure that the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. Subpart FF. [40 CFR 61.354(f)(1)]  Which Months: All Year Statistical Basis: None specified
163 [	40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
164 [	(40 CFR 63.148(c)(1)]	Conduct initial inspection of closed vent system on TS tanks in accordance with Method 21 as specified in 40 CFR 63.148(c)(1). Conduct annual inspection for visible, audible, or olfactory indications of leaks. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(c)(1)]
165	(40 CFR 63.148(f)(2)]	Vapor collection system or closed vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
166	[40 CFR 63.148(f)(2)]	Which Months: All Year Statistical Basis: None specified Vapor collection system or closed vent system (bypass lines): Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
167	[40 CFR 63.148(i)]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.148(i)(1) through (i)(6). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(i)]
168	[40 CFR 63.148(j)]	Submit the information specified in 40 CFR 63.148(j)(1) through (j)(3) with the reports required by 40 CFR 63.182(b) of subpart H or 40 CFR 63.152(c). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(j)]
169	[LAC 33:III.501]	Comply with 40 CFR 264 BB and 40 CFR 61 Subpart V by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines.  Compliance is achieved through compliance with LA MACT Determination for nonHON Sources.
170	[LAC 33:III.5107.A.2]	Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
171	[LAC 33:III.5109.A]	VOC, Total monitored by technically sound method within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled to determine if it is leaking, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).  Which Months: All Year Statistical Basis: None specified

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### Group: PCS 0002 TS Process

### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

172	[LAC 33:III.5109.A]	Pressure relief device in gas/vapor service: VOC, Total < 500 ppm except during pressure releases, as measured by the method specified in
		Section P.3, as specified in Section F.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995)
172	[[ A G 22-XXX 5100 42	which Mohins. All Year Statistical Basis: None specified
173	[LAC 33:III.5109,A]	Valves in gas/vapor service and in light liquid service (percent leaking valves <= 2 for two consecutive semiannual leak detection periods): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Paragraph J.2.b of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the period comply with the requirements as described in Section P.
		greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana
		MACT Determination for Non-HON Equipment Leak (March 30, 1995). Optional alternative to quarterly monitoring.  Which Months: All Year Statistical Basis: None specified
174	[LAC 33:III.5109.A]	Comply with the test methods and procedures in Section P. or specified in Subsections P. 1. through P. 6. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.
		Comply with the test methods and procedures in Section P, as specified in Subsections P.1 through P.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
175	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service (opened or otherwise had the seal broken): VOC, Total monitored by the regulation's
		specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had
		the seal broken, including those determined to be unrepairable prior to process unit shutdown, as specified in Paragraph O.8.a of the Louisiana
	·	MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up
		counted as unrepairable.
	Fr + 6 00 00 00 00	Which Months: All Year Statistical Basis: None specified
176	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in VOTAP service and, if the pump is covered by standards under NSPS, is not in VOC service, as specified in Paragraph D.4.b of the Louisiana MACT Determination for Non-HON Equipment
177	[LAC 33:III.5109.A]	Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
		Delay of Repair: Repair equipment before the end of the next process unit shutdown, if repair is technically infeasible without a process unit shutdown as specified in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the Louisiana MACT Determined in Subsection M.1 of the MacT Determined in Subsection M.1 of the MacT Determined in Subsection M.1 of the MacT Determined in Subsection M.1 of the MacT Determined in Subsection M.1 of the MacT Determined in Subsection MacT Determined in Subse
178	[LAC 33:III.5109.A]	shutdown, as specified in Subsection M.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).  Pumps in light liquid service (dual mechanical seal system): Equip each barrier fluid system with a sensor that will detect failure of the seal
	•	system, the barrier fluid system, or both, as specified in Paragraph D.4.c of the Louisiana MACT Determination for Non-HON Equipment Leaks
		(March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
179	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service (welded completely around the circumference of the interface or physically removed
	4.7	and the pipe welded together). Equipment/operational data monitored by the regulation's specified method(s) within three months after being
		weided. Check the integrity of the weld by monitoring according to the procedures in Section P or by testing using x-ray, acquetic monitoring
		nydrotesting, or other applicable method, as specified in Subsection 0.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks
100		(March 30, 1995). Comply with this requirement instead of the requirements in Subsection O.
•		Which Months: All Year Statistical Basis: None specified

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### Group: PCS 0002 TS Process

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

180	[LAC 33:III.5109.A]	Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: VOC, Total monitored by the regulation's specified method(s) within 5 days of finding evidence of a potential leak by visual, audible, olfactory, or any other detection method, as specified in Section K.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 10000 ppm or greater for agitators, 2000 ppm or greater for pumps or 1000 ppm or greater for valves, connectors, instrument systems, or pressure relief devices is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection K.3. Which Months: All Year Statistical Basis: None specified
181	[LAC 33:111.5109.A]	Connectors in gas/vapor service and in light liquid service: Repair Leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Subsection O.8. Make a first attempt at repair no later than 5 calendar days after each leak is detected. If a leak is detected, monitor the for leaks within the first 90 days after its repair, as specified in Subsection O.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
182	[LAC 33:III.5109.A]	Pressure relief device in gas/vapor service: After each pressure release, return to a condition of no leakage, as indicated by an instrument reading of less than 500 ppm, as soon as practicable, but no later than five calendar days after each pressure release, except as provided in Section M, as specified in Section F.2.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
183	[LAC 33:III.5109.A]	Identify each piece of equipment in a process unit subject to this MACT determination such that it can be distinguished readily from equipment that is not subject to this MACT determination, as specified in Subsection C.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
184	[LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (skip period leak detection and repair): Notify DEQ 30 days before implementing any of the alternate provisions of Section J, as specified in Subsection R.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
185	[LAC 33:III.5109.A]	Sampling connection systems: Equip with a closed-purge system or closed-vent system, except as provided for in Section C, as specified in Subsection G.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Ensure that this system collects or captures the sample purge for return to the process.
186	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service (percent of leaking connectors > 2): VOC, Total monitored by the regulation's specified method(s) quarterly until good performance is obtained or until four quarterly monitorings have been performed, as specified in Subsections O.2 and O.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If good performance has not been obtained after four quarters of monitoring, monitor the remaining unchecked connectors within six months of the last quarterly monitoring period, as specified in Subsection O.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If monitoring of the remaining connectors indicates good performance, monitor in accordance with Subsection O.4. If monitoring of the remaining connectors indicates that good performance has not been obtained, monitor in accordance with Subsection O.5. Monitor using the method specified in Section P. If an instrument reading >= 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M. Which Months: All Year Statistical Basis: None specified

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#### Group: PCS 0002 TS Process

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

FUG	10003 FUG-15 - Treatme	ent Services Fugitive Emissions
	[LAC 33:III.5109.A]	Pumps in light liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection D.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
188	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service: Calculate the percent leaking connectors using the equation in Subsection O.12 for
		use in determining the monitoring frequency, as specified in Subsection 0.12 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
189	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.  Which Months: All Year Statistical Basis: None specified
190	[LAC 33:III.5109.A]	Pumps in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly. Monitor to detect leaks using the methods specified in Subsection P.2, except as provided in Subsection C.4 and Subsections D.4, D.5, and D.6, as specified in Paragraph D.1.a of
		the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If an instrument reading of 2000 ppm or greater is
	·	measured, a leak is detected. If a leak is detected, initiate repair provisions as specified in Subsection D.3.
		Which Months: All Year Statistical Basis: None specified
191	[LAC 33:III.5109.A]	Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection K.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no
102	[LAC 33:III.5109.A]	later than 5 calendar days after each leak is detected.
, , , 2	[Zive 35.III.5105.A]	Submit report: Due semiannually starting six months after the initial report required in Subsection R.1. Include the information specified in Paragraphs R.2.a through R.2.e, as specified in Subsection R.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
193	[LAC 33:III.5109.A]	Open-ended valves or lines: Monitor and repair in accordance with Section I, as specified in Subsection H.4 of the Louisiana MACT
	•	Determination for Non-HON Equipment Leaks (March 30, 1995).
194	[LAC 33:HI.5109.A]	Pumps in light liquid service (dual mechanical seal system): Equipment/operational data monitored by visual inspection/determination daily, if pump is in service. Check sensor daily or equip with an audible alarm, as specified in Subparagraph D.4.e.i of the Louisiana MACT
		Determination for Non-HON Equipment Leaks (March 30, 1995). If the sensor indicates failure of the seal system, the barrier fluid system, or
		both based on the criterion determined in Paragraph D.4.e.ii, a leak is detected. If a leak is detected initiate repair provisions specified in
	1	Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
100		Which Months: All Year Statistical Basis: None specified

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#### Group: PCS 0002 TS Process

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

195	[LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (difficult-to-monitor): VOC, Total monitored by the regulation's specified method(s) at
.,,		the regulation's specified frequency. Maintain a written plan that requires monitoring of the valve at least once per calendar year, as specified in
•		Subsection I.6.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified
		in Subsection P.2. Comply with this requirement instead of the requirements in Subsection I.1.
		Which Months: All Year Statistical Basis: None specified
196	[LAC 33:III.5109.A]	VOC, Total recordkeeping by logbook within 90 days of placing equipment back in service that had been physically removed from service,
		disassembled or dismantled. Maintain records as required in Subsection Q.5, as specified in Subsection C.5 of the Louisiana MACT
		Determination for Non-HON Equipment Leaks (March 30, 1995).
197	[LAC 33:III.5109.A]	Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve that seals the open end at all times except during operations
		requiring process fluid flow through the open-ended valve or line or during maintenance and repair, as specified in Subsection H.1 of the
		Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
198	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service (percent of leaking connectors <= 2): VOC, Total monitored by the regulation's
		specified method(s) annually, as specified in Subsections O.2 and O.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks
		(March 30, 1995). Annual monitoring shall be performed per the Louisiana Fugitive Emission Program Consolidation Guidelines which states as
		once every four quarters. Monitor using the method specified in Section P. If an instrument reading >= 1000 ppm is measured, a leak is
		detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
		Which Months: All Year Statistical Basis: None specified
199	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar),
		if pump is in service, as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
1.		If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in
		Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
200	T A C 22 Y E 100 A 1	Which Months: All Year Statistical Basis: None specified
200	[LAC 33:III.5109.A]	Pressure relief device in gas/vapor service: VOC, Total monitored by the regulation's specified method(s) within 5 days (calendar) after the pressure release to confirm the condition of no leakage, as indicated by an instrument reading of less than 500 ppm above background, as
		specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method
	;	specified in Subsection P.3. Women using the method specified in Subsection P.3.
		Which Months: All Year Statistical Basis: None specified
201	[LAC 33:III.5109.A]	Open-ended valves or lines (equipped with a second valve): Operate in a manner such that the valve on the process fluid end is closed before the
201	[BAC 55.III.5105.A1]	second valve is closed, as specified in Subsection H.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
202	[LAC 33:III.5109.A]	Sampling connection systems (closed-purge or closed-vent system): Return the purged process fluid directly to the process line with zero
202	[2.10 05.111.0105.71]	VOTAP emissions to the atmosphere, or collect and recycle the purged process fluid with zero VOTAP emissions to the atmosphere, or be
		designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of Section N,
		as specified in Subsection G.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
		as specified in decision of the constitution between the tree trees that the constitution bears (

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FUG 0003 FUG-TS - Treatment Services Fugitive Emissions			
203 [LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than two meters above a support service, as specified in Subsection I.6.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.1.		
204 [LAC 33:HI.5109.A]	Attach a weatherproof and readily visible identification, marked with the equipment identification, to leaking equipment, as specified in Subsection Q.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).		
205 [LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both, as specified in Subparagraph D.4.e. it of the Louisiana MACT.		
206 [LAC 33:III.5109.A]	Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1. Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).		
207 [LAC 33:111.5109.A]	Valves in gas/vapor service and in light liquid service (percent leaking valves >= 4): VOC, Total monitored by the regulation's specified method(s) monthly, as specified in Subsection I.7 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Subsection P.2. Initiate monthly monitoring within 60 days of the previous monitoring and continue until the percent of leaking valves is less than 4, at which time monitoring can be performed in accordance with Subsection I.1		
208 [LAC 33:III.5109.A]	Which Months: All Year — Statistical Basis: None specified  Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HON		
209 [LAC 33:III.5109.A]	Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected. Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device that complies with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emissions to the atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply		
	with this requirement instead of the requirements in Subsection D.1.		

#### RLP 0013 2 - Sulfuric Acid Unit No. 2

210	[40 CFR 60.83(a)(1)]	Acid mist <= 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H2SO4, the production being expressed as 100% H2SO4.
		Subpart H. [40 CFR 60.83(a)(1)]
	$(\mathcal{A}_{i,j})_{i=1}^{n} = (\mathcal{A}_{i,j})_{i=1}^{n} Which Months: All Year Statistical Basis: None specified	
211	[40 CFR 60.83(a)(2)]	Opacity < 10 percent. Subpart H. [40 CFR 60.83(a)(2)]
	人名英格兰 人名英格兰	Which Months: All Year Statistical Basis: None specified
212	[40 CFR 60.85(a)]	Use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR
	•	60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.85(a)]
213	[40 CFR 60.85(b)]	Determine compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and procedures
		specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]

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#### Group: PCS 0002 TS Process

RLP 0013 2 - Sulfuric Acid	Unit No. 2
214 [40 CFR 60.Subpart H]	Rhodia shall comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H, Appendix B and Appendix F.
215 [40 CFR 60.Subpart H]	Shall meet a limit of 3.0 lbs SO2/ton, expressed as lbs. of SO2 emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.
216 [40 CFR 60.Subpart H]	Rhodia shall comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.
217 [40 CFR 60.Subpart H]	Shall meet a 365-day rolling average limit of 2.2 lbs. of SO2 per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on January 1, 2011 and demonstrate compliance by January 1, 2012.)  Which months: All year Statistical Basis: 365-day rolling average.
218 [40 CFR 60.Subpart H]	Rhodia shall comply with the monitoring requirements for SO2 set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
219 [LAC 33:III.501.C.6]	Rhodia shall install continuous emission monitors (CEMs) for NOx as part of the debottlenecking project. STATE ONLY.
220 [LAC 33:III.5107.A.2]	Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### RLP 0014 3 - Sulfuric Acid Unit No. 1

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221	[40 CFR 60.83(a)(1)]	Acid mist <= 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H2SO4, the production being expressed as 100% H2SO4.
		Subpart H. [40 CFR 60.83(a)(1)]
		Which Months: All Year Statistical Basis: None specified
222	[40 CFR 60.83(a)(2)]	Opacity < 10 percent. Subpart H. Effective starting on May 1, 2012. [40 CFR 60.83(a)(2)]
		Which Months: All Year Statistical Basis: None specified
223	[40 CFR 60.85(a)]	Effective May 1, 2012, use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as
		specified in 40 CFR 60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40]
		CFR 60.85(a)]
224	[40 CFR 60.85(b)]	Effective May 1, 2012, determine compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test
		methods and procedures specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]
225	[40 CFR 60.Subpart H]	Effective May 1, 2012, Rhodia will comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A,
		Subpart H, Appendix B and Appendix F.
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#### Group: PCS 0002 TS Process

#### RLP 0014 3 - Sulfuric Acid Unit No. 1

226	[40 CFR 60.Subpart H]	Effective May 1, 2012, meet a 365-day rolling average limit of 1.9 lbs. of SO2 per ton of 100% sulfuric acid produced, averaged over all
		operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring
		on May 1, 2012 and demonstrate compliance by May 1, 2013.)
224	[40 GPD 60 G 1	Which months: All year Statistical Basis: 365-day rolling average.
227	[40 CFR 60.Subpart H]	Conduct a SO2 Performance Test by August 29, 2012, to demonstrate compliance with the 3-hour average SO2 emissions limit. Such test must
		consist of at least 9 runs and be conducted pursuant to 40 CFR Part 60. Appendix A. Reference Method 8 and Appendix B. Performance
		Specification 2. This can serve as the CEMS relative accuracy test required under Performance Specification 2, and as applicable, the required NSPS performance test under 40 CFR 60.8.
228	[40 CFR 60.Subpart H]	Effective May 1, 2012. Phodia will comply with the promitation requirements 6, 600, 4, 6, 41 is 40 grap 60.2.
	, .,	Effective May 1, 2012, Rhodia will comply with the monitoring requirements for SO2 set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
229	[40 CFR 60.Subpart H]	Effective May 1, 2012, Rhodia will comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A,
	•	Subpart H and Appendix F.
230	[40 CFR 60.Subpart H]	Effective May 1, 2012, meet a limit of 3.0 lbs SO2/ton, expressed as lbs. of SO2 emissions per ton of 100% sulfuric acid produced, averaged
		over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this
		requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas
		blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and
231	[LAC 33:HI.1311.C]	fuel oil) to the furnace cease.  Onacity <= 20 percent; except emissions may have an appropriate to the furnace cease.
		Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. This requirement applies from the effective date until April 30, 2012.
		Which Months: All Year Statistical Basis: Six-minute average
232	[LAC 33:III.1503.A.1]	Sulfur dioxide <= 2000 ppmv. This requirement applies from the effective date until April 30, 2012.
222	[[ A C 22 37 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Which Months: All Year Statistical Basis: Three-hour average
233	[LAC 33:III.1503.D.1]	Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC
		33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and
	•	for any additional compliance determinations as requested by DEQ. This requirement applies from the effective date until April 30, 2012.

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#### Group: PCS 0002 TS Process

#### RLP 0014 3 - Sulfuric Acid Unit No. 1

234	[LAC 33:III.1511.A]	Sulfur dioxide monitored by continuous emission monitor (CEM) continuously, except as specified in LAC 33:III.1511.C and 1511.D. Ensure that the measurement system is certified according to Performance Specification 2 of 40 CFR 60, Appendix B, and quality assured by the procedures in 40 CFR 60, Appendix F. Prior to May 1, 2012, Minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time. Up to 20 minutes per day for calibration will not be counted against the 90% data capture. If the analyzer is out for more than one hour, an alternate method is needed to ensure that concentration and lb/hr limits are met. As such, Rhodia will reduce the acid production rate to 425 ton/day or conduct Reich tests at one hour intervals. Normal waste fuel feed rates may continue. If the analyzer is out for >3 days in a month, the continuous monitoring requirement can be satisfied by increasing Reich testing frequency to 15 min intervals until the analyzer is back in service. If a spare analyzer is installed, a cylinder gas audit will be conducted on the spare analyzer prior to being put into service. RATA testing will continue using the same schedule as for the analyzer that was replaced. This requirement applies from the effective date until API 30, 2012. On and after May 1, 2012, Comply with Alternative Monitoring Plan per Consent Decree.
		Which Months: All Year Statistical Basis: None specified
235	[LAC 33:III.1513.A.1]	Sulfur dioxide recordkeeping by continuous emission monitor (CEM) continuously. This requirement applies from the effective date until April 30, 2012.
236	[LAC 33:III.1513.A.2]	Submit compliance determination results: Due no later than 90 days after completion of test. This requirement applies from the effective date until April 30, 2012.
237	[LAC 33:III.1513.A.2]	Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data. This requirement applies from the effective date until April 30, 2012.
238	[LAC 33:III.1513.E]	Submit excess emissions report: Due quarterly in accordance with LAC 33:1. Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions. This requirement applies from the effective date until April 30, 2012.
239	[LAC 33:III.1513.E]	Make all compliance data available to a representative of DEQ or the U.S. EPA on request. This requirement applies from the effective date until April 30, 2012.
240	[LAC 33:III.1513.E]	Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15. This requirement applies from the effective date until April 30, 2012.
241	[LAC 33:III.501.C.6]	Rhodia shall install continuous emission monitors (CEMs) for NOx as part of the debottlenecking project. STATE ONLY.
242	[LAC 33:III.5107.A.2]	Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### EQT 0140 10 - Preheater; Acit Unit No. 1

EQT 0140 TO - Freneater, Acit ont No. 1		
243 [LAC 33:III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator,	
<i>:</i>	equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute	
	period in any 60 consecutive minutes.	
	Which Months: All Year Statistical Basis: None specified	
244 [LAC 33:III.1313.C]	Total suspended particulate <= 0.6 lb/MMBTU of heat input.	
	Which Months: All Year Statistical Basis: None specified	

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#### EQT 0140 10 - Preheater; Acit Unit No. 1

245 [LAC	33:III.	1513.C]
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Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

#### EQT 0141 11 - Lime Silos

246 [LAC 33:III.1311.B]

Total suspended particulate <= 32.95 lb/hr using a max hourly operating rate throughput of 22.5 tons/hr. The rate of emission shall be the total of all emission points from the source.

Which Months: All Year Statistical Basis: None specified

247 [LAC 33:III.1311,C]

Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60

consecutive minutes.

Which Months: All Year Statistical Basis: Six-minute average

#### EQT 0142 12 - Oleum Loading Vent Scrubber

248 [LAC 33:III.501.C.6]	Scrubber Flow rate >= 50 gallons/min. Based on a four-hour block average. Applies only when venting to atmosphere. This requirement does
•	not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the
	oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY
·	Which Months: All Year Statistical Basis: Four-hour average

[LAC 33:III.501.C.6] 250 [LAC 33:HI.501.C.6]

[LAC 33:III.501.C.6]

[LAC 33:III.501.C.6]

[LAC 33:III.501.C.6]

253 [LAC 33:III.501.C.6]

Flow rate recordkeeping by electronic or hard copy once every four hours. Applies only when venting to atmosphere. This requirement does not

apply during periods of planned routine maintenance on the scrubber. STATE ONLY.

Maximum scrubber solution strength of Sulfuric acid <= 20 percent. Maximum acid strength of 20%, based on a weekly sample. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable scrubber, STATE ONLY.

Which Months: All Year Statistical Basis: Weekly maximum

Maximum scrubber solution strength of Sulfuric acid recordkeeping by electronic or hard copy weekly. Applies only when venting to

atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY. Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges

specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

Maximum scrubber solution strength of Sulfuric acid monitored by product sampling weekly. Applies only when venting to atmosphere. This

requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.

Which Months: All Year Statistical Basis: Weekly maximum

Flow rate monitored by flow rate monitoring device once every four hours. Applies only when venting to atmosphere. This requirement does

not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.

Which Months: All Year Statistical Basis: None specified

#### EQT 0146 20 - Sulfur Feed Tank

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#### EQT 0146 20 - Sulfur Feed Tank

255 [LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to
	show annual potential sulfur dioxide emissions.

#### EQT 0149 24 - Oleum Barge Loading Scrubber

256	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device once every four hours when barge vents are routed to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
257	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
258	[LAC 33:III.501,C.6]	Scrubber water must be replaced after every two barges loaded. STATE ONLY.
259	[LAC 33:III.501.C.6]	Flow rate >= 15 gallons/min when barge vents are routed to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
260	[LAC 33:111.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

#### EQT 0152 28 - Gasoline Storage Tank

261	[LAC 33:III.2103.A]	Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure
		greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
262	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

#### EQT 0153 6-90 - Package Boiler

263	[40 CFR 60.44b(a)]	Nitrogen oxides <= 0.1 lb/MMBTU heat input (expressed as NO2), except as provided in 40 CFR 60.44b(k). The nitrogen oxide standards apply at all times, including periods of startup, shutdown, or malfunction. Subpart Db. [40 CFR 60.44b(a)]
		Which Months: All Year Statistical Basis: Thirty-day rolling average
264	[40 CFR 60.46b(c)]	Determine compliance with the NOx standards in 40 CFR 60.44b through performance testing under 40 CFR 60.46b(e) or (f), or under 40 CFR 60.46b(g) or (h), as applicable. Subpart Db. [40 CFR 60.46b(c)]
265	[40 CFR 60,48b(b)(1)]	Oxygen or Carbon dioxide recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR
205	[40 (1)(0)(48-00)	The state of the s
		60.48b(b)(1)]
266	[40 CFR 60.48b(b)(1)]	Nitrogen oxides monitored by CMS continuously. Calculate nitrogen oxides emission rates as specified in 40 CFR 60.48b(d), except as
		provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
•		Which Months: All Year Statistical Basis: One-hour average
267	[40 CFR 60.48b(b)(1)]	Nitrogen oxides recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
268	[40 CFR 60.48b(b)(1)]	Oxygen or Carbon dioxide monitored by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR
		60.48b(b)(1)]
		Which Months: All Year Statistical Basis: One-hour average

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#### EQT 0153 6-90 - Package Boiler

269	[40 CFR 60.48b(c)]	Operate NOx continuous monitoring systems and record data during all periods of operation except for continuous monitoring system
270	[40 CFR 60.48b(e)]	Nitrogen oxides: Follow the procedures under 40 CFR 60.13 and 40 CFR 60.48b(e)(1) through (e)(3) for installation, evaluation, and operation
271	[40 CFR 60.48b(f)]	When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, obtain emission data by using standby monitoring systems 40 CFR 60. Appendix A. Method 7. Appendix A.
		approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating
272	[40 CFR 60.48b(g)]	day, in at least 22 out of 30 successive steam generating unit operating days. Subpart Db. [40 CFR 60.48b(f)] Comply with the provisions of 40 CFR 60.48b(b), (c), (d), (e)(2), (e)(3), and (f), or monitor steam generating unit operating conditions and
273	[40 CFR 60.49b(b)]	Submit the performance test data from the initial performance test and the performance evaluation of the CFMS using the applicable.
274	[40 CFR 60.49b(d)]	Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period.
275	[40 CFR 60.49b(g)]	calendar month. Subpart Db. [40 CFR 60.49b(d)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the information listed in 40 CFR 60.49b(g)(1) through (g)(10) for each steam generating unit operating day, except as provided under 40 CFR
276	[40 CFR 60.49b(h)]	60.49b(p). Subpart Db. [40 CFR 60.49b(g)] Submit excess emissions report: Due by the 30th day following the end of each six-month period. Report any excess emissions which occurred during the reporting period. Subpart Db. [40 CFR 60.49b(h)]
277	[40 CFR 60.49b(i)]	Submit reports containing the nitrogen dioxide emission rate information recorded under 40 CFR 60.49b(g). Subpart Db. [40 CFR 60.49b(i)]
278	[40 CFR 60.Subpart Db]	The permit specific requirements pertaining to NOx and O2 CEMs become effective upon installation of the NOx analyzer in 1H2010.
279	[40 CFR 60.Subpart Db]	The permit specific requirements pertaining to the 30-day performance test per 40 CFR 60.46b(e) become effective upon installation of the NOx CEMs in 1H2010.
280	[LAC 33:III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator,
	$\mathbf{v}_{i} = \mathbf{v}_{i} + \mathbf{v}_{i} $	equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
281	[LAC 33:III.1313.C]	Which Months: All Year Statistical Basis: None specified Total suspended particulate <= 0.6 lb/MMBTU of heat input. Which Months: All Year Statistical Basis: None specified
282	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

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#### EQT 0153 6-90 - Package Boiler

283	[LAC 33:III.507,H.1.a]	

Nitrogen oxides: When NOx emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, obtain emissions data by using a DEQ-approved monitoring plan per 40 CFR 60.49b(c) to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

#### EQT 0186 1-06 - Rental Boiler

284	[40 CFR 60.44b(k)]	Limit boiler operation to an annual capacity factor of 10 percent or less for natural gas. [40 CFR 60.44b(k)]
285	[40 CFR 60.49b(b)]	Submit the maximum heat input capacity data from the demonstration of the maximum heat input capacity of the affected facility to DEQ. Subpart Db. [40 CFR 60.49b(b)]
286	[40 CFR 60.49b(d)(2)] ·	Record and maintain records of the amount of each fuel combusted during each calendar month. [40 CFR 60.49b(d)(2)]
287	[40 CFR 60.49b(p)]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the calendar date, the number of hours of operation, and the hourly steam load for each steam generating unit operating day. Subpart Db. [40 CFR 60.49b(p)]
288	[40 CFR 60.49b(q)]	Submit a report to DEQ containing the annual capacity factor over the previous 12 months, the average fuel nitrogen content during the reporting period if residual oil was fired, and all other applicable information per 40 CFR 60.49b(q)(1) through (q)(3). Subpart Db. [40 CFR 60.49b(q)]
289	[40 CFR 60.49b]	Report information specified in 40 CFR 60.49b(d); (o); (p); (q) and (w). Semi-annual reporting.
290	[LAC 33:III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).  Which Months: All Year Statistical Basis: None specified
. 291	[LAC 33:III.1313.C]	Total suspended particulate <= 0.6 lb/MMBTU of heat input. Which Months: All Year Statistical Basis: None specified
292	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

#### EQT 0291 M10 - Diesel Fire-Water Pump

293	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first.
		Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
		Which Months: All Year Statistical Basis: None specified
294	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first.
		Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
	:	Which Months: All Year Statistical Basis: None specified
295	[40 CFR 63.6603(a)]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of
		the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
296	[40 CFR 63.6603(a)]	Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]

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#### EQT 0291 M10 - Diesel Fire-Water Pump

297	[40 CFR 63.6605(a)]	Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
298	[40 CFR 63.6605(b)]	Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
299	[40 CFR 63.6625(e)]	Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
300	[40 CFR 63.6625(f)]	Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
301	[40 CFR 63.6640(a)]	Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ [40 CFR 63.6640(a)]
302	[40 CFR 63.6640(f)(1)ii]	Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]
303	[40 CFR 63.6640(f)(1)iii]	Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to
		the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
304	[40 CFR 63.6655]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
305	[40 CFR 63.Subpart ZZZZ]	The 40 CFR 63 Subpart ZZZZ requirements listed for this engine become effective on May 3, 2013.
306	[LAC 33:III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
	[LAC 33:HII.1311.C]	Which Months: All Year Statistical Basis: None specified  Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).  Which Months: All Year Statistical Basis: Six-minute average

#### GRP 0002 CAP-SAU - SULFURIC ACID UNITS 1 & 2

Group Members: RLP 0013 RLP 0014

Al ID: 1314 - Rhodia Inc Activity Number: PER20100009 Permit Number: 0840-00033-V3 Air - Title V Regular Permit Major Mod

#### GRP 0002 CAP-SAU - SULFURIC ACID UNITS 1 & 2

308	[LAC 33:III.509.R.6.a]	Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable.
309	[LAC 33:HII.509.R.6.c]	After the first unit is debottlenecked, the permittee shall monitor the Sulfuric Acid Mist emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Sulfuric Acid Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering.
310	[LAC 33:HI.509.R.6.e]	Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

#### GRP 0021 CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)

Group Members: EQT 0186RLP 0013 RLP 0014		
311 [LAC 33:III.509.R.6.a]	Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a	
	description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual	
	emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion)	
	and an explanation for why such amount was excluded, and any netting calculations, if applicable	
312 [LAC 33:III.509.R.6.c]	After the first unit is debottlenecked, the permittee shall monitor the NOx emissions that are emitted by this emission source (Unit 1 + Unit 2)	
	which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average	
	basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production	
	and the emission factor(s) established in the air permit application, except for debottlenecked units which shall use data collected from NOx	
	CEMs	
313 [LAC 33:III.509.R.6.c]	After the first unit is debottlenecked, the permittee shall monitor the PM10 emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average	
	minor could invivable as a result of the project and calculate and maintain a record of the annual officiality, in 17 1 of a 12-month forming average	

and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering. . .

basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production

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#### GRP 0021 CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)

314 [LAC 33:III.509.R.6.e]

Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

#### UNF 0002 UNF02 - Facility Wide

315	[40 CFR 60.]	All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
316	[40 CFR 61.145(b)(1)]	Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies
317	[40 CFR 61.148]	Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. [40 CFR 61.145(b)(1)] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
318		Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
319	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Rhodia maintains records for five years as required by Title V. Subpart FF.
320	[40 CFR 61.357(d)(2)]	Submit report: Due annually, beginning on the date that equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3) or, if the information in 40 CFR 61.357(a)(1) through (3) is not changed in the following year, a statement to that effect. Subpart FF. [40 CFR 61.357(d)(2)]
	- ·	All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
322	[40 CFR 63.1(b)(3)]	An owner or operator of a stationary source who is in the relevant source category and who determines that the source is not subject to a relevant standard or other requirement established under 40 CFR 63 Subpart A must keep a record as specified in 63.10(b)(3).  [40 CFR 63.1(b)(3)]
323	[40 CFR 63.1095(a)(1)iii]	Keep a record of each shipment of continuous butadiene waste streams. Subpart XX. [40 CFR 63.1095(a)(1)iii]
324	[40 CFR 63.1095(a)(1)]	Route the continuous butadiene stream to a treatment process or wastewater treatment system used to treat benzene waste streams that complies with the standards specified in 40 CFR 61.348. Subpart XX, [40 CFR 63.1095(a)(1)]
325	[40 CFR 63.1095(a)(1)]	Include list of continuous butadiene waste streams in annual benzene NESHAP report and note whether or not streams were controlled. 40 CFR 63.1095(a)(1)(iv) & (v). Subpart XX. [40 CFR 63.1095(a)(1)]
326	[40 CFR 63.1095(a)(1)]	Comply with the requirements of 40 CFR 61 Subpart FF, with the changes in 40 CFR 63 Subpart XX Table 2 and 40 CFR 63.1095(a)(1)(i) through (a)(1)(v). Subpart XX. [40 CFR 63.1095(a)(1)]

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327	[40 CFR 63.1095(a)(3)]	Comply with the requirements of 40 CFR 63.1095 at all times except during periods of startup, shutdown, and malfunction, if the startup, shutdown, or malfunction precludes the ability of the affected source to comply with the requirements of 40 CFR 63.1095 and the provisions for periods of startup, shutdown, and malfunction, as specified in 40 CFR 63.1111, are followed. Subpart XX. [40 CFR 63.1095(a)(3)]
328	[40 CFR 63.1096(b)]	Submit to EPA a written certification that affected waste streams will be managed and treated per the applicable sections in 40 CFR 63 Subpart XX. Not required unless/until wirtten notice is received from generator of subject stream(s). Waste streams regulated under Subpart XX are to
		be treated and managed per 40 CFR Part 61 Subpart FF, National Emission Standards for Benzene Waste Operations. Rhodia's Baton Rouge site is already in compliance with Subpart FF and will manage XX-regulated waste streams in the same manner as for FF-regulated waste streams. Specifically, the XX-regulated waste streams will be burned as fuel in Unit No. 1 or Unit No. 2. Subpart XX. [40 CFR 63.1096(b)]
329	[40 CFR 63.1256(a)(5)(ii)(A)]	Submit to EPA a written certification that affected wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.1256 (b) - (i). Not required unless/until wirtten notice is received from generator of subject stream(s). Affected wastewater streams and/or residuals will be direct burned (i.e., bypassing storage) in the Unit No. 1 or Unit No. 2 furnace. [40 CFR 63.1256(a)(5)(ii)(A)]
330	[40 CFR 63.1256(b)]	Comply with 40 CFR 63.1256(b) for each wastewater tank that receives, manages, or treats affected wastewater or its residual. Only Tanks 30D290 and 30D300 will be used for Subpart GGG regulated streams. [40 CFR 63.1256(b)]
331	[40 CFR 63.1256(d)(1)(iii)]	For containers (trucks/railcars), the cover and all openings will be maintained in a closed position at all times that affected material is in the container except when necessary to use the opening for removal, inspection, sampling, or pressure relief events related to safety considerations.  [40 CFR 63.1256(d)(1)(iii)]
332	[40 CFR 63.1256(g)(13)ii]	Discharge affected streams to a boiler burning hazardous waste for which a final permit has been issued under 40 CFR Part 270 and that complies with the requirements of 40 CFR Part 266 Subpart H. The regeneration furnaces are regulated under RCRA as industrial furnaces and are defined as boilers in 40 CFR 1251. Per 1256(g)(13), RCRA units are exempt from the design evaluation or performance test requirements and from the monitoring requirements in 1256(a)(2)(iii) as well as recordkeeping and reporting requirements associated with monitoring and performance tests. [40 CFR 63.1256(g)(13)ii]
333	[40 CFR 63.132(g)(2)]	Submit to EPA a written certification, signed by responsible official, that Group 1 wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.133 - 63.147. Not required unless/until written notice is received from generator of subject stream(s). [40 CFR 63.132(g)(2)]
334	[40 CFR 63.132(g)]	Rhodia will comply with the provisions for off-site treatment of Group 1 HON wastewater or wastewater residuals in accordance with 40 CFR 63.132(g) if/when applicable. Subpart G. [40 CFR 63.132(g)]
335	[40 CFR 63.147]	Maintain records as required by 40 CFR 63.147. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G.
336	[40 CFR 63.152(b)]	Submit a Notification of Compliance Status (NCS) report within 150 days of the compliance date. As the treatment facility, the compliance date is the date upon which notice is first received that a HON Group 1 wastewater or wastewater residual has been received onsite. [40 CFR 63.152(b)]
337	[40 CFR 63.152(c)]	Submit Periodic Reports: Due semiannually no later than 60 calendar days after the end of each 6-month period, except as specified in 40 CFR 63.152(c)(5) and (c)(6). Submit the first report no later than 8 months after the date the Notification of Compliance Status is due. Include the information specified in 40 CFR 63.152(c)(2) through (c)(4). Subpart G. [40 CFR 63.152(c)]

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338	[40 CFR 63.152(f)]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records as specified in 40 CFR 63.152(f)(1) through
339	[40 CFR 68.150]	(f)(7). Subpart G. [40 CFR 63.152(f)] Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first
		instead under 68,150, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and
340	[40 CFR 68.155]	format to a central point as specified by EPA prior to June 21, 1999.  Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (g).
341	[40 CFR 68.160]	Complete a single registration form and include in the DATE. Governal and the elements listed in 68.155(a) through (g).
	•	Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (13).
342	[40 CFR 68.165]	Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (13).
343	[40 CFR 68.180]	Provide in the RMP the emergency response information listed in 68.180(a) through (c).
344	[40 CFR 68.190(c)]	Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the
		stationary source is no longer covered. [40 CFR 68.190(c)]
345	[40 CFR 68.190]	Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
346	[40 CFR 68.200]	Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
347	[40 CFR 68.22]	Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
348	[40 CFR 68.25]	Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
349	[40 CFR 68.30]	Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
350	[40 CFR 68.33]	List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
351	[40 CFR 68.36(b)]	Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source
	•	increase or decrease the distance to the endpoint by a factor of two or more, [40 CFR 68.36(b)]
352	[40 CFR 68.36]	Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the
		distance to the endpoint by a factor of two or more.
353	[40 CFR 68.39]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.
354	[40 CFR 68.42]	Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property
		damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (10) for each accidental release.
355	[LAC 33:III.1103]	Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111
	7	or intensify an existing traffic hazard condition are prohibited.
356	[LAC 33:III.1109.B]	Outdoor burning of waste material or other combustible material is prohibited.

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357 [1	LAC 33:111.1303.B]	Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
358 [1	LAC 33:111.2113.A]	Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
359 [1	LAC 33:III.219]	Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
360 [	LAC 33:III.2901.D]	Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
361 [	LAC 33:III.2901.F]	If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
362 [	LAC 33:III.501.C.6]	Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HRVOC), which include 1,3-Butadiene, Butene, cis-2-Butene, trans-2-Butene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. (State Only).
363 [	LAC 33:III.501.C.6]	Maintain, to the extent practicable, a leak-free facility taking such steps as are necessary and reasonable to prevent leaks and to expeditiously repair leaks that occur. Update the written plan presently required by LAC 33:III.2113.A.4 within 30 days of receipt of this permit to incorporate these general duty obligations into the housekeeping procedures. The plan shall then be considered a means of emission control subject to the required use and maintenance provisions of LAC 33:III.905. Failure to develop, use, and diligently maintain the plan shall be a violation of this permit. (State Only).
364 [	LAC 33:III.501.C.6]	Total HAP <= 8.92 tons/yr. Total HAP emissions are capped at 8.92 TPY. Which Months; All Year Statistical Basis: Annual maximum
365 [	LAC 33:III.5105.A.1]	Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III. Chapter 51. Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III. Chapter 51. Subchapter A, after the effective date of the standard.
366 [	LAC 33:111.5105.A.2]	Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.
367 [	LAC 33:III.5105.A.3]	Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
368 [	LAC 33:111.5105.A.4]	Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.
	LAC 33:III.5107.A.2]	Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
370 [	[LAC 33:III.5107.A]	Submit Annual Emissions Report: Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.

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371	[LAC 33:III.5107.B.1]	Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595
		initinediately, but in no case later than I hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in
	•	an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant
372	[LAC 33:III.5107.B.2]	adverse impact to the land, water or air environment, or cause severe damage to property)
312	[5/10/55.111.5/07.15.2]	Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized
	**	discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was
		not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33 III 5112. Table 51 b. or a reportable quantity (RO) in LAC 33 III 5112. Table 51 b. or a reportable quantity (RO) in LAC 33 III 5112.
		in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one
373	[LAC 33:III.5107.B.3]	pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923.  Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any
	•	unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in
		excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931.
		Submit notification in the manner provided in LAC 33:1.3931.
374	[LAC 33:III.5107.B.4]	Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as
	-	referred to in LAC 33:111.5107.B.1 through B.3. Include the information specified in LAC 33:111.5107 B.4 a i through B.4 a viii
375	[LAC 33:III.5107.B.5]	Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel runture, a sudden equipment failure, or
		a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIETED
		USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the
376	[LAC 33:III.5109.C]	identity of the source, the date and time of the discharge, and the approximate total loss during the discharge
370	[5/10/35/11/5/10/10]	Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC
		33:III. Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures or parameters established to ensure that compliance with the applicable standards
		is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC
		33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
377	[LAC 33:III.5113.A.1]	Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of
;		the initial start-up.
378	[LAC 33:III.5113.A.2]	Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date
		of initial start-up of the source.
379	[LAC 33:III.5113.B.1]	Ensure that all testing done to determine the emission of toxic air pollutants is conducted by qualified personnel.
380	[LÄC 33:III.5113.B.1]	Submit test results: Due in writing to the Office of Environmental Assessment within 60 days after completion of the test. Submit test results
		signed by the person responsible for the test.
381	[LAC 33:III.5113.B.1]	Submit notification of testing: Due to the Office of Environmental Assessment at least 30 days prior to testing.
382	[LAC 33:III.5113.B.2]	Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.

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383 [	LAC 33:III.5113.B.3]	Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants.	
384 [	LAC 33:III.5113.B.4]	Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through B.4.e.	
385 [	LAC 33:III.5113.B.5]	Submit certified letter: Due to the Office of Environmental Assessment before the close of business on the sixtieth day following the completion of the emission test. Report the determinations of the emission test.	
386 [	LAC 33:III.5113.B.5]	Analyze samples and determine emissions within 30 days after each emission test has been completed.	
387 [	LAC 33:III.5113.B.6]	Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.	
388 [	[LAC 33:III.5113.B.7]	Submit notification: Due to the Office of Environmental Assessment at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.	
389 [	[LAC 33:III.5113.C.1]	Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.	
390 [	[LAC 33:III.5113.C.5.d]	Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters.	
391 [	[LAC 33:III.5113.C.5.e]	Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii.	
392 [	[LAC 33:III.5113.C.7]	Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.	
393	[LAC 33:III.5151.F.1.f]	An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.	
394	[LAC 33:III.535]	Permittee shall comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537].	
395	[LAC 33:III.5611.A]	Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.	
396	[LAC 33:III.5611.B]	During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any perso authorized by the department to enforce these regulations.	ß
397	[LAC 33:III.5901.A]	Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.	
398	[LÁC 33:III.5907]	Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.	
399	[LAC 33:III.5911.A]	Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III.Chapter 59, whichever is later. Include the information listed in LAC 33:III.5911.B, and submit to the Office of Environmental Compliance.	
400	[LAC 33:III.5911.C]	Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.	
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Air - Title V Regular Permit Major Mod

#### UNF 0002 UNF02 - Facility Wide

401 [LAC 33:III.919.D]	40 I	: 33:111.919.D]
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Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.

#### 402 [LAC 33:III.927]

Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.

#### CATHYVAL PLANT - E RHOI BATON ROUGE, EAST BATO

#### **TABLE 1: APPLICABLE LOUISIANA AN**

Source ID					W		ISF	_			N	ESI S	IAP		IES PS	
	TEMPO ID	Descriptive Name of Source				40	CF	R 60			4	_	FR		CFR	
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101		Lights Tank Farm Scrubber C-165	_	-	<u> </u>		-	<del></del>		-	-	-		<del>-</del>	╁	
D-148		Vanillin Solvent 1 Tank (MIBK Storage)					$\vdash$	<del> </del>	<u></u>		Н	$\vdash$		+	┢	
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102		Heavies Tank Farm Scrubber C-187				<u> </u>	<del> </del>					┼─	<b></b>	$\vdash$	┼-	
D-107		Guaiacol Storage Tank			2		$\vdash$				-	├		┼	┢╾	
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103		Condensation Scrubber C-201	_		<del></del>			-		<b></b>	<del> -</del>	$\vdash$	$\vdash$	+-	$\vdash$	
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C-207		Veratrole Stripper	Н				$\vdash$				ļ	├	<del>                                     </del>	$\vdash$	$\vdash$	
C-216		Guaiacol Recycle Tank								-		-		┼	⊢	
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C-219		No. 2 Condensation Reactor										<del> </del>		-	├	
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C-223		No. 4 Condensation Reactor	_											╁	┢┈	
C-225		No. 5 Condensation Reactor					<u> </u>								一	
C-227		Polishing Reactor													┢	
104		Solvent 1 Vent Scrubber C-248												H	┢	
C-236		Neutralization Surge Tank									H	$\vdash$		$\vdash$	⊢	
C-240		Extractor Tails Upset Tank							<b></b>		H				_	
C-241		Guaiacol Extraction Column						i						${}^{\dagger}$	H	
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C-244		Mandelate Surge Tank	$\dashv$											$\vdash$	┢	
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C-249		Solvent 1 Surge Tank	$\neg$									-		Н	┢	
C-301		Guaiacol Recovery Column													┢	
C-306		Guaiacol / Tars Separator												П		
C-312		Solvent 1 Stripper Decanter												П	-	
C-314	EQT201	Solvent 1 Stripper												П		
C-316		Solvent 1 Cold Trap												П		
C-320		Guaiacol Distillation Reflux Drum	ヿ											П	Г	
C-322X		Solvent 1 Vacuum Package Separator	┪											П	Г	
H-317		Vacuum System												П		
106		Vanillin Extraction Scrubber C-427	$\neg$											П		
C-421		Solvent 2 Surge Tank												<b> </b>		
C-429		CO2 Separator												П		
C-430		Solvent 2 Decanter		$\neg$										П		
C-432		Extraction 2 Drain Tank						-						$\square$		
C-434		Extraction 2 Tails Safety Decanter		$\neg$							П			П		
C-435		Vanillin Extraction Column	┪								П			П		
C-440		Solvent 2 Washing Column	$\dashv$			Ť					Н			$\Box$	Н	
C-441		Aqueous Phase Surge Tank		$\dashv$										H	Н	

#### ATON ROUGE FACILITY IA, INC. N ROUGE PARISH, LOUISIANA

## FEDERAL AIR QUALITY REQUIREMENTS

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February 15, 2010

Ms.Cheryl Sonnier Nolan
Assistant Secretary
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

RE:

Application for Renewal of a Title V Permit

Lyne Lamie Wallace

Rhodia, Inc.

Agency Interest No. 1314

Permit No. 2184-V1

Dear Ms. Nolan:

On behalf of Rhodia, Inc., Providence is submitting this Title V air permit renewal application for the Cathyval Plant, Permit No. 2184-V1. Rhodia is submitting this permit renewal application in accordance with LAC 33:III.507.E.

PROVIDENCE

Please call Ms. Julie Sheffield (359-3432) or Mr. John Richardson (359-3768) if you have any questions.

Sincerely, Providence

Lynne Lamia Wallace Project Engineer

**Enclosure** 

cc Julie Sheffield, Rhodia

Shannon Snyder EPA Region 6 1445 Ross Ave.

Dallas, TX 75202-2733

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# **FEBRUARY 2010**

# RHODIA, INC.

# **CATHYVAL PLANT**

TITLE V PERMIT RENEWAL APPLICATION

AGENCY INTEREST NO. 1314

Prepared By:

**Providence** 

1201 Main Street Baton Rouge, Louisiana 70802

(225) 766-7400

www.providenceeng.com

Project Number 015-007







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#### **Figure**

Site Location Map

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## <u>Appendix</u>

A Letter of Approval of Alternate Means of Compliance

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# SECTION 1.0 INTRODUCTION

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#### 1.0 INTRODUCTION

#### 1.1 Background

Rhodia, Inc. (Rhodia) owns and operates the Cathyval Plant in Baton Rouge, East Baton Rouge Parish, Louisiana. The Cathyval plant is collocated with the Rhodia Sulfuric Acid plant. Rhodia is bounded by U.S. 190 (Airline Highway) on the south, the Canadian Northern Railroad on the east, industrial area on the north, and the Mississippi River on the west. Figure 1 shows the site location.

The Cathyval Plant produces fine organic specialty chemicals that are used in food, fragrances, pharmaceuticals, and as laboratory reagents.

#### 1.2 Project Description

The Cathyval Plant currently operates under Title V (Part 70) Operating Permit Number 2184-V1, issued September 4, 2007. This permit expires on August 16, 2010. In accordance with the requirements of LAC 33:Part III Chapter 5, Rhodia is submitting a renewal application at least six months prior to the expiration of the current Part 70 permit (i.e., February 16, 2010). Rhodia is therefore requesting renewal of its Part 70 permit for the Cathyval Plant.<sup>1</sup>

Changes and permit reconciliations addressed in this renewal application include:

• Rhodia is requesting approval to remove Scrubber C-419 (EPN 105, EQT0028) from service. C-419 was designed in the late 1980s to provide 95% control of all VOCs, regardless of the mass emission rate of the VOC vents. The vessels that vent to C-419 have negligible VOC emissions and, as such, require a very high scrubber flow rate (42 gpm) to achieve 95% control compared to other scrubbers in the CathyVal plant (0.22 to 7.0 gpm). Stack testing is scheduled the week of February 22, 2010 to confirm Rhodia's belief that the minimal VOC control achieved does not warrant the energy and water resources currently being consumed to operate C-419. In anticipation of a successful test, this application includes a "delete" EIQ form for C-419 and an "add" EIQ form (EPN 111) for the uncontrolled "Oxidation Vent". Related to the proposed removal of C-419, the analyzer vents currently routed there are being added to the list of Insignificant Activities.

<sup>&</sup>lt;sup>1</sup> The Rhodia Sulfuric Acid Plant is authorized under a separate permit and is not covered under this permit renewal application.

- A more accurate emission calculation for the cooling towers (EPN M-5, EQT 0125) has replaced the previous calculation. See the letter dated October 13, 2009 from Rhodia to LDEQ (Ms. Celena Cage) for background on this issue.
- Tote loading of o-vanillin, currently allowed per a Notice and Go form submitted October 24, 2007, is being incorporated into the permit as an Insignificant Activity.
- Predephenoling Vent Condenser E-318 and Detarring Condenser E-506 are being added to the equipment list; they were inadvertently excluded in the last permit modification.

To streamline reporting requirements, Rhodia requests the following changes to the current Specific Requirements (SR):

Delete the scrubber reports required by SRs 5, 26, 42, 51, 73, 91, 122, 142, 161, 165, 182, 242, 262, 285, and 300, since this information is provided in the semiannual Title V monitoring reports.

To conserve water and energy resources and to improve consistency with emission calculations regarding operation of scrubbers and condensers during plant down time, Rhodia requests the following SR changes and additions:

- Add the following SR to EQTs 019, 021, 031, 040, 045, 051, and 056, "Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed."
- Revise SRs 27, 166, 244, and 301 to state "Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits."
- Revise SRs 6 and 265 to state "Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year)."
- Add the following SR to EQTs 076, 082, and 094, "Up to 16 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation." Note, this is not a new SR per se; it is being split off from the current SRs 244, 265, and 301.

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- Move SR 263 from Scrubber C-319 (EQT 082) to Condenser E-318 (EQT TBD) and revise to state "Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year if downstream scrubber is also off)."
- Revise SR 277, if possible, or add a new SR to EQT 087 to note that the 98% control standard per LAC 33:III.2115 does not apply when the unit is shut down and D-315 emits breathing losses only (less than 100 lbs in 24 hours).
- Move SR 286 from Scrubber C-402 (EQT 089) to Condenser E-401 (EQT 251) and revise to state "Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) have their vent line valved closed such that no emissions occur."
- Revise SR 288 to state "Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) have their vent line valved closed such that no emissions occur."

#### 1.3 Process Description

The Cathyval Plant consists of the Cathy, Daphne, and Vanessa production units, and a Wastewater Treatment Unit. Steam to operate these units is supplied by the waste heat boilers in the Sulfuric Acid Plant.

#### 1.1.1 Cathy Unit

The Cathy Unit produces pyrocatechol (PC) and hydroquinone (HQ) for use as a raw material at the Daphne Unit and HQ for outside sales. PC and HQ are synthesized using a proprietary Rhodia hydroxylation process. Phenol and hydrogen peroxide react to form PC and HQ. The reaction mixture is dissolved in a light organic solvent in the extraction section. Unreacted phenol is removed using distillation and recycled back to the process. Waste acids and salts from the reaction are extracted in an aqueous phase and sent to waste water treatment. Recovered phenol is recycled and the tars are sent to the acid plant to be burned as fuel. Products (HQ and PC) are then separated in the splitter. Finally, PC is transferred to storage in molten form or flaked and packaged, and HQ is crystallized, centrifuged, dried, and packaged. PC may

also be mixed with a solvent and shipped as a liquid for certain customers.

#### 1.1.2 Daphne Unit

The Daphne unit synthesizes guaiacol and guetol using a proprietary Rhodia process. Production of guaiacol and guetol from PC is similar except that the guetol process uses ethyl chloride as a reactant, whereas the guaiacol process uses methyl chloride. Veratrole and o-diethoxybenzene (ODEB) are produced as coproducts for outside sales. Guaiacol is produced by a methylation process using PC, methyl chloride, and caustic in the presence of water and a light organic solvent. Guetol is produced by an ethylation process using PC, ethyl chloride, and caustic in the presence of water and a light organic solvent. The phases are separated, and organics in the aqueous layer are then removed by solvent extraction. The residual aqueous layer is sent to the waste treatment unit. The recovered mixture of organics and solvent is distilled to recover and recycle the solvent. It is then further distilled to recover pure guaiacol/guetol and veratrole/ODEB. The pure guaiacol/guetol is sent to the Vanessa Unit, or shipped to external customers by bulk shipments or in drums. Veratrole and ODEB are purified by washing and further distillation then shipped to external customers by bulk shipments or in drums. Heavy impurities from the distillations are sent to the acid plant to be burned as fuel.

The Daphne Unit operates in series with the Cathy and Vanessa Units, and runs more efficiently. Due to this higher efficiency, Rhodia may also utilize the Daphne Unit to manufacture paramethoxy-phenol (PMP) in place of guaiacol/guetol and veratrole/ODEB.

PMP and its byproduct para-di-methoxy-benzene (PDMB) are manufactured by methylation of HQ using methyl chloride. HQ produced by the Cathy Unit, or received from external suppliers, is used as a feedstock. The separation steps are similar to the guaiacol/guetol process. No purification of PDMB is necessary. PMP is shipped in bulk as a molten liquid.

#### 1.1.3 Vanessa Unit

The Vanessa Unit synthesizes vanillin and ethyl vanillin utilizing a proprietary Rhodia process. In vanillin production, guaiacol reacts with sodium hydroxide to form sodium guiacolate. Sodium guiacolate is then condensed with glyoxylic acid to form sodium mandelate in the condensation section. In the extraction/distillation

section, the unreacted guaiacol is then extracted with solvent. The organic phase is distilled and the aqueous phase is stripped to recover the guaiacol and solvent for recycle. In the oxidation area, the aqueous mandelate solution is reacted with air and caustic in the presence of a catalyst to form vanillate. The aqueous vanillate solution is neutralized to form the product vanillin. The vanillin is then extracted with solvent. After recovery and recycling of the solvent, the vanillin is purified by washing and distillation and converted to the solid product by flaking or crystallizing and drying. Crystallized product is packaged into boxes or other containers. Flaked product is packaged in super-sacks. Ethyl vanillin is manufactured through the same series of steps by substituting quetol for quaiacol.

#### 1.1.4 Wastewater Treatment Unit

All liquid effluents from the Cathyval Plant are routed to the Wastewater Treatment Unit via Tank 28 and/or Tank 29. The effluent is sent to the aeration basins where it is treated aerobically with an activated sludge process. The sludge is then separated from the liquid effluent in the clarifiers and solid-liquid separation equipment. The clarified effluent is then discharged to the Mississippi River. All stormwater from the Cathyval Plant is discharged to the Mississippi River after it has been flushed into Tank 29 to prevent potential contamination (oil, zinc, etc.) from reaching the river. The stored stormwater from Tank 29 is used as dilution water and treated as normal effluent into the aerobic/activated sludge process.

#### 1.4 Air Emissions

The primary emissions from the Cathyval Plant process are volatile organic compounds (VOCs), some of which are HAP/TAPs, and particulate matter (PM $_{10}$ ). There is a small amount of natural gas combustion emissions as well. The Cathyval plant is not a major Title V source on its own, but is subject to Title V permitting due to its co-location with the Sulfuric Acid Plant.

Any vent streams containing the chlorinated hydrocarbons methyl chloride and ethyl chloride are vented conveyed to the sulfuric acid regeneration furnaces in the acid plant (primarily Sulfuric Acid Unit No. 1, EPN 3, with Unit No.2, EPN 2, as backup) for combustion and HCl control. Non-chlorinated vent streams containing light organics are controlled by condensers and scrubbers. The effluent from the scrubbers is either recycled within the process or sent to the wastewater treatment unit. Some of the water sent to the wastewater treatment unit is first sent to a

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# SECTION 2.0 REGULATORY REVIEW

#### 2.0 REGULATORY REVIEW

The Cathyval Plant is subject to federal and state air quality regulations. A regulatory review has been included that describes and cites all applicable Louisiana and federal air quality requirements and standards for the affected sources in the Cathyval Plant. The regulatory review consists of the regulatory applicability tables found in Section 4.

#### 2.1 Louisiana Air Quality Regulations (LAC 33:III)

The Cathyval Plant is subject to the Permit Procedures (LAC 33:III Chapter 5), General Regulations on Control of Emissions (LAC 33:III Chapter 9), Emission Standards for Particulate Matter (LAC 33:III.Chapter 13), Control of Emissions of Organic Compounds (LAC 33:III Chapter 21), Comprehensive Toxic Air Pollutant Emission Control Program (LAC 33:III Chapter 51), Prevention of Air Pollution Emergency Episodes (LAC 33:III Chapter 56), and Chemical Accident Prevention and Minimization of Consequences (LAC 33:III.Chapter 59).

#### 2.2 New Source Performance Standards (40 CFR 60)

There are no sources in the Cathyval Plant subject to New Source Performance Standards.

#### 2.3 NESHAP Standards (40 CFR Part 61)

There are no sources in the Cathyval Plant subject to NESHAP.

#### 2.4 MACT Standards (40 CFR Part 63)

There are no sources in the Cathyval Plant subject to MACT Standards. The site is not a major source of HAPs.

#### 2.5 Non-Attainment New Source Review (40 CFR 51)

The Cathyval Plant is located in an area designated as nonattainment for ozone; however, there are no emission increases in this application that would trigger ozone nonattainment review.

#### 2.6 Prevention of Significant Deterioration (40 CFR 51)

PSD applies to all criteria pollutants in an area that has been designated as attainment; i.e. all pollutants except ozone. There are no emission increases in this application that would trigger PSD review. Therefore, PSD does not apply.

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#### 2.7 Compliance Assurance Monitoring (40 CFR 64)

The Cathyval Plant has no sources subject to the CAM provisions at the facility.

#### 2.8 Chemical Accident Prevention (40 CFR 68)

The chemical accidental release prevention program is mandated by Section.112(r) of the Clean Air Act Amendments of 1990 and is codified as 40 CFR Part 68. The Cathyval Plant is subject to this requirement and has prepared a Risk Management Plan.

#### 2.9 Stratospheric Ozone Protection (40 CFR 82)

Title VI of the Clean Air Act Amendments of 1990 requires phase out of the manufacture and use of ozone-depleting chemicals. The Cathyval Plant does not manufacture ozone-depleting substances as regulated by 40 CFR Part 82. This facility uses certified plant personnel as well as outside certified contractors to conduct on-site maintenance of equipment, which may contain ozone-depleting materials. Therefore, the Cathyval Plant is subject to Parts B and F of the Stratospheric Ozone regulations.

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 $(-1, \frac{1}{2}) + \frac{1}{2} (-1,$ 

## **SECTION 3.0**

## APPLICATION FOR APPROVAL OF EMISSIONS OF AIR POLLUTANTS

 $\{ w_{t+1} \in \mathcal{A}_{t} : \lambda_{t} \in \mathbb{R}^{n} \mid \lambda_{t} \in \mathbb{R}^{n} \}$ 



Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

## **LOUISIANA**

#### Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:HI.517.D.1]	
Facility Name (if any)	
Rhodia Baton Rouge CATHYVAL Plant	
Agency Interest Number (A.I. Number)	Currently Effective Permit Number(s)
1314	2184-V1
Company - Name of Owner	
Rhodia, Inc.	
Company - Name of Operator (if different from Owner)	
	į
Parent Company (if Company - Name of Owner given above	ve is a division)
Ownership:	
Check the appropriate box.	
corporation, partnership, or sole proprietorship reg	gulated utility
○ state government ○ fed	leral government O other, specify
State government State government	oral government.
a Di	C 22.III 517 D 18 unless otherwise stated
2. Physical Location and Process Description [LA	C 55:111.517.D.10, unless other wise stated
What does this facility produce? Add more rows as necessary  This plant produces fine organic specialty chemicals	that are used in food, fragrances, pharmaceuticals, and as
laboratory reagents.	triat are assa in resa, wag-saret, p
What modifications/changes are proposed in this application?	Add more rows as necessary.
This application is for renewal of a Title V permit.	
Nearest town (in the same parish as the facility):	Parish(es) where facility is located:
	East Baton Rouge
Baton Rouge Distance To (mi): 222 Texas 269	Arkansas 129 Mississippi 262 Alabama
Latitude Front Gate: 30 Deg 30	Min 30 Sec 30 Hundredths
Longitude Front Gate: 91 Deg 11	Min 16 Sec 58 Hundredths
Distance from nearest Class I Area 143 Kilometer	TS
	y below. If the facility has no address, provide driving directions. Add
more rows as necessary.	
1275 Airline Highway, Baton Rouge. At the foot of the old	d Mississippi River Bridge.
Man attached (required per LAC 33:III 517 D.1)	

06/06/07

Description of processes and products attached (required per LAC 33:III.517.D.2)

Introduction/Description of the proposed project attached (required per LAC 33:III.517.D.5)

3. C	onfidentiality [LAC 33.I.Chapter 5]						
_	ou requesting confidentiality for any information except air	pollute	ant emission rates?	0	Yes	•	No
subm	es," list the sections for which confidentiality is requested wittal that is separate from this application. Information for ication. Consult instructions.	below. which	Add rows as necessary. Confid confidentiality is requested shoul	entiali d not i	ty requi be subm	ests r itted	equire a with this
Com	ype of Application [LAC 33:III.517.D]  plete the appropriate column (1 or 2) that corresponds to opriate column.	the ty		ck all	that ap	ply w	vithin the
COM	Part 70 General	Colu	Part 70 Regular				
	Renewal		Renewal				
	et one, if applicable:	Select	one, if applicable:				
	Entirely new facility	П	Entirely new facility				
	Modification or expansion of existing facility (may also include reconciliations)		Significant modification or expansion include reconciliations) [LAC 33:III		cisting fa	cility	(may also
	Reconciliation only		Minor modification or expansion of include reconciliations) [LAC 33:III		ig facilit	y (ma	y also
	Individual emissions unit(s) addition		Reconciliation only				
		NSR.	Analysis:				
			PSD □ NNSR			•••	
Does	s this submittal update or replace an application currently un	der re	view?	0	Yes	•	No
If yes	s, provide date that the prior application was submitted:						
	ct one if this application is for an existing facility that does no	ot have	an air quality permit:				
	Previously Grandfathered (LAC 33:III.501.B.6)						
	Previously Exempted (e.g., Small Source Exemption; Act	918)					
	Previously Unpermitted						

		[LAC 33:II							
				parameter (such as					
number of employees or capital cost), enter that parameter here.									
		nter the Standa	rd Industrial Classi	fication (SIC) Codes	that apply to	the facility.			
Primary SIC		2869							
Secondary S	ICC(s):								
33:III.Chapte	r 2. Add ro	n: Enter fee ws to this tabl	code, permit type as needed. Inclu	oe, production capacide with the application	city/throughpon the amour	ut, and fee nt in the Gran	amount purs nd Total blank	uant c as i	to LAC
application for		EXISTING	INCREMENTAL		SURCHAF	RGE		-	TOTAL
FEE CODE	TYPE	CAPACITY	INCREASE	MULTIPLIER	NSPS	PSD	TOXICS		MOUNT
0630		88MMlb	NA					\$	1,866.00
<u> </u>						GF	AND TOTAL	\$	1,866.00
*** 1 1**	k 17 171	_4: TT 4b_		aire on avalenation	of the fee date				
**Optional*	ree Explan	ation: Use the	space provided to	give an explanation of	of the fee dete	Ammanon u	apiayed above	<del>/•</del>	
Electronic Fr	ınd Transfer	· (FFT)· If pa	ving the permit an	plication fee using a	n Electronic	Fund Transfe	er (EFT), plea	ise ii	nclude the
EFT Transac	tion Numbe	r the Date th	at the EFT was m	ade, and the total do	llar amount s	submitted in	the EFT. If	not 1	oaying the
		ng EFT, leave		,					
1	saction Num			Date of Submittal			Total Dollar	Amo	ount
LX I IIan	isaction i van	1001							
		L				··········			
6. Key Da	ites								
Estimated da	te constructi	on will comme	ence:		1	AV			
Estimated da	te operation	will commenc	e:		1	NΑ			
) <del></del>									
7. Pendin	g Permit A	Application	s – For Process	s Unit-Specific Pe	ermits Onl	y [LAC 3	3:III.517.D	.18	i
List all other	process unit	s at this facilit	v for which Part 70	permit applications	have been su	bmitted, but	have not been	acte	d upon by
LDEO as of	the date of	submittal of t	his application. If	none, state "none" i	n the table. <sup>1</sup>	**It is not no	ecessary to up	date	this table
during the pe	rmit review	process, unles	s requested by LDI	EQ.**					
	cess Unit N			mit Number		Da	te Submitted		

015-007-001NG-App form\_7195\_r00 06/06/07

8. LAC 33:I.1701 Requirements - Answer	all below for new sources a	and permit ren	ewals	
Does the company or owner have federal or state enature to, the permit for which you are applying in Leto all individuals, partnerships, corporations, or othe more in your company, or who participate in the env	environmental permits identical to, ouisiana or other states? (This req r entities who own a controlling in	or of a similar uirement applies iterest of 50% or	O Yes	• No
applying for the permit or an ownership interest in the				
If yes, list States:				
Do you owe any outstanding fees or final penalties to If yes, explain below. Add rows if necessary.	the Department?		O Yes	• No
Is your company a corporation or limited liability con If yes, attach a copy of your company's Certificate o	npany? of Revistration and/or Certificate o	f Good Standing	O Yes	• No
from the Secretary of State. The appropriate cer application as an appendix.	tificate(s) should be attached to	the end of this		
9. Permit Shield Request [LAC 33:III.517] If yes, check the appropriate boxes to indicate the specific regulatory citation(s) for which the shield circumstances that will justify the permit shield radditional pages are used, attach them directly behithe Explanation field.	type of permit shield being sou is being requested. Give an ex equest. Attach additional pages	planation of the if necessary. If	O Yes	• No
Type of Permit Shield request (check all that apply):				
Non-applicability determination	Specific Citation(s)	Ex	planation	
☐ 40 CFR 60				
☐ 41 CFR 61				
☐ 42 CFR 63				
□ PSD				
☐ NNSR				
Interpretation of monitoring/recordkeeping/ reporting and/or means of compliance	Specific Citation(s)	Ex	planation	
☐ 40 CFR 60			.,,,,,,	
☐ 41 CFR 61		····		
☐ 42 CFR 63				
☐ PSD				
□ NNSR				
State Implementation Plan (SIP)				

#### 10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application.

For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

CERTIFICATION: I certify, un	der provisio	ns in Louisiana and	CERTIFICATION: I certify	that the engine	eering calculations,
United States law which provi	de criminal	penalties for false	drawings, and design are true	and accurate	to the best of my
statements, that based on infor-	mation and	belief formed after	knowledge.		
reasonable inquiry, the statemen					İ
this Application for Approval of	Emissions of	Air Pollutants from	ı		
Part 70 Sources, including al					
compliance statement above, are	true, accurate	e, and complete.			
a. Responsible Official			b. Professional Engineer		
Name			Name		
Daniel Tate		Stephen Scott Gendron			
Title		Title			
Plant Manager			Operations Superintendent		
Company			Company		
Rhodia, Inc.		Rhodia, Inc.			
Suite, mail drop, or division			Suite, mail drop, or division		
Street or P.O. Box			Street or P.O. Box		
1275 Airline Highway			1275 Airline Highway		
City	State	Zip	City	State	Zip
Baton Rouge	LA	70805	Baton Rouge	LA	70805
Business phone			Business phone		
(225) 356-7111			(225) 359-3464		
Email Address	_		Email Address	!	,
Oanie/. tate Q Le Signature of responsible official	s. rhod	ia.com	Stephen gend	tron@US	· chodia.con
Signature of responsible official	(See 40 CFR	70.2)	Signature of Professional Engineer		
Vand of to	2/		Sigh Sent	M.	
Date			Date	,	
2/11/10			2/11/10		
			Louisiana Registration No.	27141	

11. Personnel [LAC 33:III.517.D.1] a. Manager of Facility who is located at plant site b. On-site contact regarding air pollution control Primary Contact Name **Primary Contact** Name John Richardson Daniel Tate Title Title Environmental Manager Plant Manager Company Company Rhodia, Inc. Rhodia, Inc. Suite, mail drop, or division Suite, mail drop, or division Street or P.O. Box Street or P.O. Box 1275 Airline Highway 1275 Airline Highway State Zip Zip City State City LA 70805 70805 **Baton Rouge** LA **Baton Rouge** Business phone Business phone (225) 359-3768 (225) 356-7111 Email Address Email Address d. Person who prepared this report c. Person to contact with written correspondence O Primary Contact Name **Primary Contact** Name Lynne Lamia Wallace John Richardson Title Title Project Engineer Environmental Manager Company Company Providence Rhodia, Inc. Suite, mail drop, or division Suite, mail drop, or division Street or P.O. Box Street or P.O. Box 1201 Main Street 1275 Airline Highway Zip State State Zip City City 70802 LA 70805 LA **Baton Rouge Baton Rouge** Business phone Business phone (225) 766-7400 (225) 359-3768 Email Address Email Address lynnewallace@providenceeng.com See "b" e. Person to contact about Annual Maintenance Fees Street or P.O. Box Name Zip State City Title

Suite, mail drop, or division

Company

Business phone

Email Address

#### 12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
PM <sub>10</sub>	19.51
SO <sub>2</sub>	0.03
NOx	4.41
СО	3.71
VOC Total	26.46
Ethyl Chloride	0.12
Hydroquinone	0.37
Methanol	3.38
Methyl Chloride	0.23
Methyl Isobutyl Ketone	9.11
Phenol	0.51
Pyrocatechol	0.47

#### 13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.
- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
2184-V0	August 15, 2005
2184-V1 (permit mod)	April 20, 2007
2184-V1 (amended permit)	September 4, 2007
Case by Case Insignificant Activity	October 24, 2007



#### 14. Facility-wide Permitted Emissions – For Process Unit-Specific Permits Only [LAC 33:III.517.D.3]

List each of the following:

• All currently effective air quality permits for this facility. All process units located at this facility should be represented in this section. This includes any Acid Rain or PSD permits.

For each listed currently effective air quality permit:

• Show each permitting action's grand total for each permitted pollutant. These rates should be those shown in the permitting action as issued by LDEQ and not those shown in the application for the permitting action. For administrative amendments, it is only necessary to state the emission rates that were amended.

• Group the permitted emission rates by permit action. Consult instructions.

Permit Actions	wide grand total for each policy Date Action Issued	Pollutant	Permitted Emission Rate (tons/yr)
2184-V1 (amended permit)	September 4, 2007	PM <sub>10</sub>	7.74
		SO <sub>2</sub>	0.03
		NOx	4.41
		со	3.70
		VOC Total	25.02
		Pyrocatechol	0.72
		Hydroquinone	1.13
,		Phenol	0.49
		Methyl Isobutyl Ketone	9.74
		Methanol	3.50
		Ethyl Chloride (chloroethane)	0.12
	333	Methyl Chloride (chloromethane)	0.24
0840-00033-V2	November 30, 2009	PM <sub>10</sub>	54.52
		SO <sub>2</sub> (Phase I)	12449.35
		SO <sub>2</sub> (Phase II)	4725.98
		SO <sub>2</sub> (Phase III)	1077.79
		NOx	115.58
		со	95.43
	1 - 1	VOC Total	26.16
		Pyrocatechol	1.00
		Hydroquinone	1.00

### 14. Facility-wide Permitted Emissions – For Process Unit-Specific Permits Only [LAC 33:III.517.D.3]

List each of the following:

• All currently effective air quality permits for this facility. All process units located at this facility should be represented in this section. This includes any Acid Rain or PSD permits.

For each listed currently effective air quality permit:

• Show each permitting action's grand total for each permitted pollutant. These rates should be those shown in the permitting action as issued by LDEQ and not those shown in the application for the permitting action. For administrative amendments, it is only necessary to state the emission rates that were amended.

• Group the permitted emission rates by permit action. Consult instructions.

Permit Actions	lity-wide grand total for each pol  Date Action Issued	Pollutant	Permitted Emission Rat (tons/yr)
		Phenol	0.18
		Methyl Isobutyl Ketone	0.02
		Methanol	1.00
		Ethyl Chloride (chloroethane)	0.12
		Methyl Chloride (chloromethane)	0.89
	Note: The remaining 160+	TAPs from the Sulfuric Acid Plan and are too numerous to list here	
Grand Total		PM <sub>10</sub>	62.26
		SO <sub>2</sub> (Phase I)	12449.38
	-	SO <sub>2</sub> (Phase II)	4726.01
		SO <sub>2</sub> (Phase III)	1077.82
		NOx	119.99
		со	99.13
		VOC Total	51.18
		Pyrocatechoi	1.72
		Hydroquinone	2.13
		Phenol	0.67
		Methyl Isobutyl Ketone	9.76
- Marie III		Methanol	4.50
	***	Ethyl Chloride	0.24
		Methyl Chloride	1.13

and the second of the second o

15.a. Enforcement Action	is [LAC 33:III.517.D.18]		
		s, settlement agreements, and consent	O Yes ● No
decrees received for this facili	ty and/or process unit (for pro	ocess unit-specific permits) since the	
issuance of the currently effective	e Title V Operating Permit or Sta	te Operating Permit. For each action,	
		uthority or authorities that issued the	
action, and the date that the act	ion was issued. Summarize the c	conditions imposed by the enforcement	None for the Cathyval
		Cable 2. It is not necessary to submit a	Plant
copy of the referenced action. Ac		·	
Type of Action	T . A .1	Date Action Issued	Summary of Conditions
or Tracking Number	Issuing Authority	Date Action Issued	Included?
			O Yes ● No
15 h Caladala for Commis	inmaa II A <i>C</i> 22.III 517 F <i>(</i> )	•	
	iance [LAC 33:III.517.E.4]		
		ade is not in full compliance with all	O Yes ● No
		l be achieved, including a schedule for	
compliance below. Add rows as	necessary. See instructions.		
16. Letters of Approval fo	or Alternate Methods of C	ompliance	
If yes, list all correspondence wi	th LDEQ, EPA, or other regulato	ry bodies that provides for or supports	● Yes ○ No
		e regulations for this facility or process	
		ance of the letter and the regulation	
		ments referenced in this table. Letters	
	incorporated into a final permit.		
	, , , , , , , , , , , , , , , , , , ,	<u>,                                      </u>	
Date Letter Issued	Issuing Authority	Referenced Regulation(s)	Copy of Letter Attached?
Date Letter issued		-	
April 24, 2006	LDEQ	LAC 33:III.2147.E.4.a	● Yes* ○ No
			* Appendix A
17. Initial Notifications a	nd Performance Tests [LA	.C 33:HI.517.E.1]	
		time performance tests that have been	O Yes No
		cific permits) since the issuance of the	
currently effective Title V Oner	ating Permit or State Operating	Permit in order to satisfy regulatory	
requirements Any initial notifi	cation or one-time nerformance	test requirements that have not been	
		ion. Any notifications or performance	
		ection 23, Table 2 of this application.	
Add rows to table as necessary.	and also be properly notice in be	zero. 20, zero 2 oj mis approation	
Initial Notification or			
One-time Performance Test	Regulatory Citation S	Satisfied Date Compl	eted/Approved
One-time renormance Test			

18. Existing Prevention of Significant Deterioration or Nonattainment New Source Review Limitations [LAC 33:III.517.D.18]

more NSR permits	? If "yes," su necessary. Be	mmarize the sure to note	limitations from suc	olication currently of th permit(s) in the fo ions limitations from	ollowing table.	Add
Permit No.	Date Issued	EPN	Pollutant	BACT/LAER Limit¹	Averaging Period	Description of Control Technology/Work Practice Standards

19. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality Dispersion Modeling is only required when applying for PSD permits and as requested by LDEQ.)			•	No
Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been pe this facility in support of a air permit application previously submitted for this facility or p (for process unit-specific permits) or as required by other regulations AND approved by LDE	process unit	Yes	0	No
If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:	Marc	h 2005		

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

	Pollutant	Time Period	Calculated Maximum Ground Level Concentration	TAP AAS or NAAQS
1	MIBK	8-hour	323 µg/mg	4880

<sup>&</sup>lt;sup>1</sup>For example, lb/MM Btu, ppmvd @ 15% O2, lb/ton, lb/hr



#### 20. General Condition XVII Activities

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- $\bullet \textit{Expand this table as necessary to include all such activities}. \\$
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.

_	Yes	0	No
	165	Ų	INO

	Emission Rates – TPY								
Work Activity and Schedule	$PM_{10}$	$SO_2$	$NO_X$	СО	VOC Total	Otl			
					0.01	PC HQ	<0.01 <0.01		
220 process samples/day for quality						phenol	<0.01 <0.01		
assurance. Collected in 4-oz bottles. Assume						MIBK MeOH	<0.01		
a max of 1% emitted to the atmosphere.						EtCl	<0.01		
						MeCl	<0.01		
Drum loading, unloading, and heating					0.22				
Phenol melting					0.02	phenoi	0.02		
Maintenance Activities, including:						PC	0.03		
Opening/removing pumps, compressors,						HQ	0.03		
instruments, valves, vents, and piping;			Ì			phenol	0.03		
Vessel/equipment/tank truck/ISO						MIBK	0.03		
container/rail car openings; Filter and strainer					0.25	MeOH	0.03		
change-outs; Miscellaneous equipment cleaning; Nitrogen/steam/air clearing of					1	EtCl	0.03		
equipment and lines; Waste handling/re- packaging						MeCl	0.03		
Temporary storage of materials in tank trucks					0.05	PC	0.03		
or ISO containers					0.00	HQ	<0.01		
Diesel-Fired equipment	0.41	0.38	5.72	1.23	0.46				
Fugitive dust	0.05								
Tote Loading of o-Vanillin					0.07				

21. Insignificant Activities [LAC 33:III.501.B.5]

Enter all activities that qualify as Insignificant Activities.

- Expand this table as necessary to include all such activities.
- For sources claimed to be insignificant based on size or emission rate (LAC 33:III.501.B.5.A), information must be supplied to verify each claim. This may include but is not limited to operating hours, volumes, and heat input ratings.
- If aggregate emissions from all similar pieces of equipment (i.e. all LAC 33:III.501.B.5.A.1 activities) claimed to be insignificant are greater than 5 tons per year for any pollutant, then the activities can not be claimed as insignificant and must be represented as permitted emission sources. Consult instructions.

Yes	0	No

mon actions.			
EPN	Description	Physical/Operating Data	Citation
	Defoamer for Tars Process	55 gallon drums	LAC 33:III.501.B.5.A.2
	Defoamer for WWTU	55 gallon drums	LAC 33:III.501.B.5.A.2
	Polymer for WWTU - Vulcan 4864	250 gallon totes	LAC 33:III.501.B.5.A.2
D-309X	Clarifier Polymer Feed Tank	1050 gallons	LAC 33:III.501.B.5.A.3
D-407X	Filter Polymer Feed Tank	1690 gallons	LAC 33:III.501.B.5.A.3
D-317X	Polymer Makeup Tank	880 gallons	LAC 33:III.501.B.5.A.3
D-320	Clarifier Floating Layer Tank	750 gallons	LAC 33:III.501.B.5.A.3
D-323	Clarifier Underflow Tank	3170 gallons	LAC 33:III.501.B.5.A.3
D-316	Effluent Pump Tank	4300 gallons	LAC 33:III.501.B.5.A.3
D-420	Filtrate Tank	1260 gailons	LAC 33:III.501.B.5.A.3
C-104	Perchloric Acid Tank, P&ID F103	Vents to Y-132	LAC 33:III.501.B.5.A.4
D-101	H <sub>2</sub> O <sub>2</sub> Tank P&ID F102	Vents to Y-120V	LAC 33:III.501.B.5.A.4
D-102	H <sub>2</sub> O <sub>2</sub> Tank P&ID F102	Vents to Y-121V	LAC 33:III.501.B.5.A.4
D-106	Polyphosphoric Acid Tank, P&ID F103	Vents to Y-136	LAC 33:III.501.B.5.A.4
D-605	Metabisulfate Injection Tank, P&ID F601	Vents to atmosphere	LAC 33:III.501.B.5.A.4
D-664	Oxalic Acid Injection Drum	Vents to atmosphere	LAC 33:III.501.B.5.A.4
	4 Laboratory Vents	NA	LAC 33:III.501.B.5.A.6
	Analyzer Vents	NA	LAC 33:III.501.B.5.A.9
D-186	Vanessa Caustic Storage	100,900 gallons	LAC 33:III.501.B.5.B.40
D-305	Cathy Caustic Storage, P&ID F-302	1200 gallons	LAC 33:III.501.B.5.B.40
C-210	Daphne Caustic Storage	1200 gallons	LAC 33:III.501.B.5.B.40
C-243	Sulfuric Acid Dilution Tank	958 gallons	LAC 33:III.501.B.5.D

22. Regulatory Applicability for Commonly Applicable Regulations [LAC 33:III.517.D.10] Does this facility contain asbestos or asbestos containing materials? Yes No If "yes," the facility or any portion thereof may be subject to 40 CFR 61, Subpart M, LAC 33:III.Chapter 27, and/or LAC 33:III.5151 and this application must address compliance as stated in Section 23 of this application. Is the facility or process unit represented in this permit subject to 40 CFR 68, or is any other process Yes O No unit located at the same facility as the process unit represented in this application subject to 40 CFR 68? If "yes," the entire facility is subject to 40 CFR 68 and LAC 33:III. Chapter 59 and this application must address compliance as stated in Section 23 of this application. Is the facility listed in LAC 33:III.5611 Yes No Table 5 0 Yes No 0 Table 6 No Yes Table 7 Does the applicant own or operate commercial refrigeration equipment normally containing more than Yes No 50 pounds of refrigerant at this facility or process unit? If "yes," the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of this application.

# 23. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping

Important points for Table 1 [LAC 33:III.517.D.10]:

- List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.
- Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.
- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC 33:III.2103 Storage of Volatile Organic Compounds would never apply to a steam generating boiler, no matter the circumstances.
- Consult instructions.

Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been fulfilled.
- Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be employed. It is not sufficient to state that all compliance options will be employed, though multiple compliance options may be approved as alternative operating scenarios.
- Consult instructions.

Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the exemption or non-applicability status of the regulation to that source.
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into the Citation Providing for Exemption or Non-applicability column.
- Consult Instructions.

Important points for Table 4 [LAC 33:III.517.D.18]

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not route its emissions in this manner.
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise appear in this permit application.
- Consult instructions.

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#### 24. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:III.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common emissions point. Note any emissions sources that route to this common point in Table 4 of the application.
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
  - 1. Sources that combust multiple fuels
- 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or emissions points:
  - 1. Equipment leaks.
  - 2. Non-equipment leaks (i.e. road dust, settling ponds, etc).

#### For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form. http://www.deq.louisiana.gov/portal/LinkClick.aspx?link=permits%2fair%2f6-6-07 EIQ.xls&tabid=2758

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25.	NSR.	Applicability	Summary	[LAC 33:III.504	4 and LAG	C 33:III.509]
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□ N/A

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC 33:III.504 or in LAC 33:III.509) proposing to permit a physical change or change in the method of operation. It would also apply to existing minor stationary sources proposing a physical change or change in the method of operation where the change would be a major source in and of itself. Add rows to each table as necessary. Provide a written explanation of the information summarized in these tables. Consult instructions.

25.A. Project Summary

		A	В	С	D	E	F
EPN	Description	New, Modified, Affected, or	Pre-Project Allowables	Baseline Actual Emissions	Projected Actuals	Post-Project PTE	Change
		Unaffected*	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)
PM <sub>10</sub>	24-Month Period:				ı		
					1	PM <sub>10</sub> Change:	0

<sup>\*</sup>Unaffected emissions units are not required to be listed individually. By choosing not to list unaffected emissions units, the applicant asserts that all emissions units not listed in Table 24.A will not be modified or experience an increase in actual annual emissions as part of the proposed project.

25.B. Creditable Contemporaneous Changes

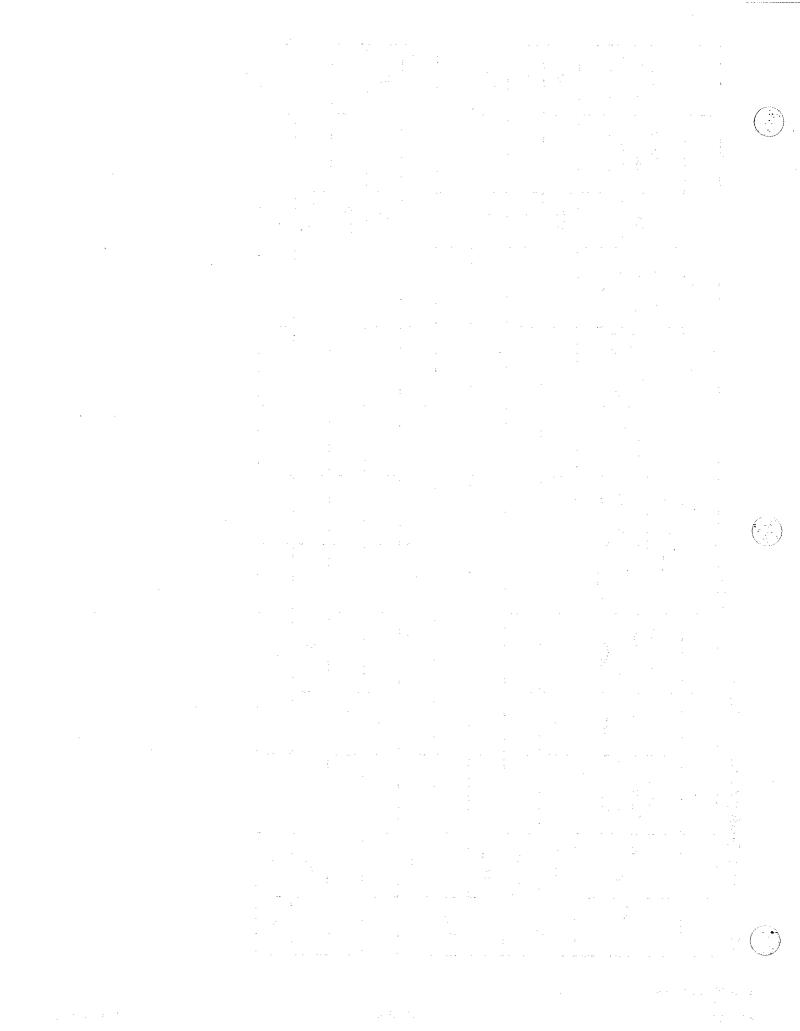
		A	В	С	D	E	F
EPN	Description	Date of Modification	Pre-Project Allowables	Baseline Actual Emissions	24-Month Period	Post-Project PTE	Change
			(TPY)	(TPY)	(TPY)	(TPY)	(TPY)
PM <sub>10</sub>							

25.C. BACT/LAER Summary

	For each source identified as "New" or "Modified" in Section 24.A, complete the following table for each pollutant that will trigger									
NSR. If LAER is not required per LAC 33:III.504.D.3, indicate such.										
EPN										

# 25.D. PSD Air Quality Analyses Summary

		A	В	С	D	E	F	G	Н	I	J	K	
		Preliminary	Level of	Significant	At the Monit	oring Station		Maximum	Maximum	Modeled + Background		Modeled PSD	Allowable
Pollutant	Averaging Period	Screening Concentration (µg/m³)	Significant Impact (µg/m³)	Monitoring Concentration (μg/m³)	Monitored Values (μg/m³)	Madalina   (110/m <sup>3</sup> )				NAAQS (μg/m³)	Increment Consumption (μg/m³)	Class II PSD Increment (µg/m³)	
PM <sub>10</sub>	24-hour		5	10						150		30	
PIVI <sub>10</sub>	Annual		1	-						50		17	
	3-hour		25	-						1300		512	
SO <sub>2</sub>	24-hour		5	13	· ;					365		91	
	Annual		1	-						80		20	
NOx	Annual		1	14						100		25	
	1-hour		2000	-						40000		-	
co	8-hour		500	575						10000		-	
Pb	3-month		-	0.1			_			1.5		_	



25.E Nonattainment New Source F	Review Offsets [L	AC 33:II	I.517.D.16, LAC 3	3:III.504.D	.4 & 5]	
Complete this section only if the proposed p	project triggers Nonatti	ainment Ne	w Source Review (NN	SR).	□ N/A	
This project triggers NNSR review for:	□ NOx	□ VO	C			
NO <sub>x</sub> :						
Is the applicant proposing to use internal of	ffsets?			0 )	Yes ●	No
If not, identify the source of the offsets.	Company:					
	Facility/Unit:					
	Permit No.:					
Is an ERC Bank Application included with t submitted to LDEQ?	this application, or has	s an applica	ution already been	0 \	Yes ●	No
If the ERC application has already been sub	omitted, give the date:					
Identify the emissions units from which the	offsets will be obtaine	ed (reference	e specific Emission Po	int ID numbers	s).	
VOC:						
Is the applicant proposing to use internal of	ffsets?			0 1	Yes ●	No
If not, identify the source of the offsets.	Company:					
	Facility/Unit:					
	Permit No.:					***
Is an ERC Bank Application included with t submitted to LDEQ?		s an applica	ation already been	0 1	Yes ●	No
If the ERC application has already been sub	omitted, give the date:					
Identify the emissions units from which the		ed (referenc	e specific Emission Po	int ID numbers	s).	
			AND THE PARTY OF T	<del></del>		
In order to expedite processing, please be s should clearly differentiate between ozone NOX and VOC, be sure to indicate if a poregulations, use in a netting analysis, etc.).	e season and non-ozor	ne season a	actual emissions during	g the baseline	period. R	Regardir
25.F. Economic Impact						
Answer the following questions.						
How many temporary jobs will be added as						
How many permanent jobs will be added as	s a result of this project	t?				

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#### 25.G Notification of Federal Land Manager [LAC 33:III.504.E.1, LAC 33:III.509.P.1]

Complete this section only if the proposed project triggers NNSR or PSD. a. Is the proposed facility or modification located within 100 kilometers of a Class I Area? Yes No If Yes, determination of Q/d is not required; skip to the next question. If No, complete the Q/d equation below: net emissions increase of PM<sub>10</sub><sup>1,2</sup>  $PM_{10 \text{ (NEI)}} + SO_{2 \text{ (NEI)}} + NO_{X \text{ (NEI)}} + H_2SO_{4 \text{ (NEI)}}$ PM<sub>10 (NEI)</sub> O/d =net emissions increase of SO<sub>2</sub><sup>1,2</sup> Class I km SO<sub>2 (NEI)</sub> net emissions increase of NO<sub>X</sub><sup>1,2</sup> NO<sub>X (NED)</sub> net emissions increase of H2SO41,2 H<sub>2</sub>SO<sub>4 (NEI)</sub> distance to nearest Class I Area3 Class I km Q/d =If Q/D < 4, proceed to Section 26. If  $Q/D \ge 4$ , complete the remainder of this Section. No b. Has the applicant provided a copy of the application to the Federal Land Manager? Yes 0 c. Does the application contain modeling that demonstrates no adverse impact on Air Quality Related Yes No 0 Values (AQRVs) in the Class I Area? Other<sub>4</sub>: d. If Yes, indicate the model used: VISCREEN PLUVUE II П e. Has the Federal Land Manager concurred that the proposed project will not adversely impact any No Yes 0 AQRVs? If Yes, please attach correspondence. If the net emissions increase of any pollutant is negative, enter "0." <sup>2</sup>If the project did not trigger a netting analysis, use the project increase. In this case, the value will be less than the pollutant's significance level. In kilometers. <sup>4</sup>Model must be approved by LDEQ and the Federal Land Manager.

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26. Environmental Assessment Statement (EAS or "IT" Question Responses) [La. R.S. 30:2018]

This section is required when applying for new Part 70 operating permits and/or major modifications. Any applications for these permit types that do not include answers to these questions will not be considered to be administratively complete.

For new Part 70 operating permits and/or major modifications, answers to these questions must be provided by the applicant to the local governmental authority and the designated public library at no additional costs to these entities. Consult instructions to determine what is considered to be a "local governmental authority" and a "designated public library". Indicate the name and address of the local governmental authority and the designated public library to which the answers to these questions were sent:

Name of Local Governing Authority

Name of Designated Public Library

Street or P.O. Box

Street or P.O. Box

Answer the following five questions on separate pages using full and complete answers. Include as many pages as necessary in order to provide full and complete answers. This information is required per Louisiana Revised Statutes 30:2018 (La. R.S. 30:2018).

City

Zip Code

State

City

Question 1: Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible? (This question requires the permittee to identify adverse environmental effects, both potential and real.)

Question 2: Does a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former? (This question requires the permittee to perform a cost-benefit analysis, or at least a quantitative indication of the economic benefits and a qualitative description of the negative impacts expected from the permittee's operation. The latter should come from the answer to Question 1.)

Question 3: Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing non-environmental benefits? (This question requires the permittee to demonstrate having considered alternate technologies.)

Question 4: Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing non-environmental benefits? (This is the question that deals directly with siting criteria.)

Question 5: Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing non-environmental benefits? (This question requires the permittee to demonstrate having considered the most stringent techniques for reducing or more efficiently handling waste.)

Zip Code

State

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#### PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit  Application	Yes	No	N/A	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	•	0	0	NA
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	•	0	0	Section 3, Item 10
517.B.3 Certification		•	0	0	Section 3, Item 10
517.D.1 Identifying Information	Does the Application Include:				
	1. Company Name, Physical and Mailing Address of Facility?	•	0	0	Section 3, Item 2
	2. Map showing Location of the Facility?	•	0	0	Figure 1
	3. Owner and Operator Names and Agent?	•	0	0	Section 3, Item 1
	4. Name and Telephone Number of Plant Manager or Contact?	•	0	0	Section 3, Item 10
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	•	0	0	Section 1.3
	Does the Application Include the Source's SIC Code?	•	0	0	Section 3, Item 5
	Does the Application Include EPA Source Category of HAPs if applicable?	0	0	•	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	•	0	0	Section 5
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	0	0	•	
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	0	0	•	
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	•	0	0	Section 5
517 D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	•	0	0	Section 4
517.D.9 Calculations	Are Emission Calculations Provided?	•	0	0	Section 6
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	•	0	0	Section 4
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	0	0	•	
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33.III.5111)?	0	0	•	
517.D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	0	0	•	

# PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit  Application	Yes	No	N/A	Location Within the Permit Application
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K, L, and M?	0	0	•	
517 D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	0	0	•	
517.D.16, 18	Has any Additional Information been Provided?	0	0	•	
517.D.17 Fees	Has the Fee Code been Identified?	•	0	0	Section3, Item 5
	Is the Applicable Fee Included with the Application?	•	0	0	Attached
517.E.1 Additional Part 70 Requirements	Does the Certification Statement Include a Description of the Compliance Status of Each Emission Point in the Source with All Applicable Requirements?	•	0	0	Section 3, Item 10
517E.2 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will continue to Comply with All Applicable Requirements with which the Source is in Compliance?	•	0	0	Section 3, Item 10
517.E.3 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will, on a timely basis, meet All Applicable Requirements that will Become Effective During the Permit Term?	•	0	0	Section 3, Item 10
517.E.4 Additional Part 70	Are there Applicable Requirements for which the Source is not in Compliance at the Time of Submittal?	0	•	0	
Requirements	Does the Application include a Compliance Plan Schedule?	0	0	•	
	Does the Schedule Include Milestone Dates for which Significant Actions will occur?	0	0	•	
	Does the Schedule Include Submittal Dates for Certified Progress Reports?	0	0	•	
Part 70	Is this Source Covered by the Federal Acid Rain Program?	0	•	0	
Requirements Acid Rain	Are the Requirements of LAC 33.III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	0	0	•	
517.E.6 Additional Part 70	Have any Exemptions from any Applicable Requirements been Requested?	0	•	0	
Requirements	Is the List and explanations Provided?	0	0	•	
517.E.7 Additional Part 70	Does the Application Include a Request for a Permit Shield?	0	•	0	
Requirements	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding Draft Permit Terms and conditions which are Proposed to Maintain Compliance?	0	0	•	
517.E.8 Additional Part 70	Does the Application Identify and Reasonably Anticipated Alternative Operating Scenarios?	0	•	0	
Requirements	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including Source Process and Emissions Data?	0	0	•	

# PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	0	•	0	
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting from the Change?	0	0	•	
	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	0	0		
	Does the Certification also Request that Minor Modification Procedures be Used?	0	0	•	
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	0	0		
La. R.S. 30:2018 — PSD/NNSR only	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 26) been sent to the local governing authority at no cost to the local governing authority?	0	0	•	
	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 26) been sent to the designated public library at no cost to the designated public library?	0	0	•	

# **SECTION 4.0**

# APPLICABLE REGULATIONS, AIR POLLUTION CONTROL MEASURES, MONITORING, AND RECORDKEEPING

(<u>§</u>)

#### CATHYVAL PLANT - I RHOI BATON ROUGE, EAST BATO

**TABLE 1: APPLICABLE LOUISIANA AN** 

									•=		NE	Sŀ	IAP	N	E
							ISP					S			25
Source ID	TEMPO ID	Descriptive Name of Source				40	CFF	R 60			1	_	FR	ı	FF
No:	I EIVIPO ID	Descriptive Name of Source	Н						·	l	-4'	<u>, c</u>			
				Ka	Kb+	w	111	NNN	RRR	YYY	A	М	FF	A	F
C-501	EQT037	Solvent 2 Distillation Surge Tank								-					
C-504		Vanillin/Solvent 2 Atmospheric Distillation													
0 00 .		Column													L
C-507	EQT212	Vanillin/Solvent 2 Vacuum Distillation							·						
0 001		Column												l	
C-516	EQT213	Solvent 2 Cold Trap	П								Ī			l	
C-533X		Solvent 2 Vacuum Package Separator													Γ
C-558		Aqueous Effluents Tank									Г				Γ
C-565	EQT215	Solvent 2 Recovery Column (Aqueous									П		Ī		Π
0 000		Phase Stripper)													
C-568	EQT216	Solvent 2 Recovery Column (Top	Г												Γ
0 000		Rectification)	l											1	
C-575	EQT039	Solvent 2 Recovery Decanter	T											Τ	Γ
E-428	A	Condenser	T								Π			Т	Г
H-520		Vacuum System	T											П	Г
107	FQT0040	Distillation Scrubber C-557	T										<u> </u>		
C-525		Tars Removal Column	T											П	Γ
C-529		Tars By-Pass Tank	T	<u> </u>							П		Π	Г	Γ
C-535		Tars Surge Tank	1								П				Г
C-545		Lights Removal Column	1							<u> </u>					Т
C-555A/B	EQT222	Vanillin Cold Traps	Τ			<u> </u>						T		Π	Γ
C-562X	EQT223	Vanillin Purification Vacuum Package	T												Γ
0 002/		Separator											İ		
C-616	EQT042	Flaker Surge Tank										Γ			Γ
C-648	EQT043	Recycle Product Hopper Melter	T								П				Π
C-655		Melter Surge Tank	T								Г			Τ	Ι
H-556		Vacuum System													$oxed{\mathbb{L}}$
108	EQT0045	Crystallization Scrubber C-624	T'''					,	1						L
	T .	Methanol Washing Drum (Vents through	Т								Π			Ī	Γ
C-541	EQT046	C-801)						].							L
C-603	EQT048	Dissolver										1		L	L
C-606	EQT049	Vacuum Crystallizer												<b>L</b> _	┖
C-617	EQT050	Centrifuge Surge Tank											<u> </u>	┸	L
C-634X	EQT225	Dryer Scrubber								Ţ			<u> </u>	上	L
C-637X	EQT226	Crystallization Vacuum Package Separator	П												1
									<u> </u>		L			上	L
C-640	EQT227	Dryer									L		<u> </u>	L	Ļ
C-801	EQT047	Solvent 3 Recovery Feed Tank												L	L
C-805	EQT228	Solvent 3 Recovery Column									L	<u> </u>	<u> </u>	丄	Ţ
H-619	EQT229	Vacuum System							]		丄				Ţ
Y-620	EQT230	Centrifuge A										1	.	$\perp$	$\downarrow$
Y-621	EQT231	Centrifuge B									_	_	$oxed{oxed}$	_	丄
Y-640	EQT232	Dryer									L			L	$\downarrow$
109	EQT0051	Baghouse Filter / Scrubber C-704												$\perp$	┸
110	EQT139	High Purity PC Mixing Vessel	$\perp$												┸
111	new	Oxidation Vent	$oxed{\Box}$												1
C-407	EQT206	Oxidation Reactor	Τ										1		1

#### ATON ROUGE FACILITY IA, INC. N ROUGE PARISH, LOUISIANA

# FEDERAL AIR QUALITY REQUIREMENTS

A		40 CFR								LAC 3	3:111						LA	C 33	:III.C	hap	ter
3	64	68	70	82																	,,,,,
F							1311. C	1313. C		2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59
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#### CATHYVAL PLANT - I RHO BATON ROUGE, EAST BATO

#### **TABLE 1: APPLICABLE LOUISIANA AN**

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Source ID	TEMPO ID	Descriptive Name of Source				40	CFI	₹ 60			ΙΔ		FR		F
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			A	Ka	Kb+	w	Ш	NNN	RRR	YYY	A	M	FF	Α	۱F
C-409	EQT029	Mandelate Surge Tank	T				Г				Г	Г		Т	Г
C-416	EQT207	Oxidation Column													Г
D-417		Oxidation Surge Tank			2								П	Г	Г
201		Tank Farm Scrubber C-146	П												Г
D-111	EQT053	Pyrocatechol Storage Tank			2										
D-128		Tars Storage Tank	T								Г				Г
D-141	EQT055	Veratrole Storage Tank													Г
202		Vent Scrubber C-685													
C-201	EQT057	PC Dissolution Tank	T												
C-553	EQT058	Guaiacol Distillation Feed Tank										<u> </u>			Г
C-561	EQT059	Recycle Process Water Tank													
C-603	EQT060	Guaiacol Distillation Tank									Γ				Γ
C-606	EQT233	Guaiacol Distillation Column										Г			Γ
C-615	EQT061	Tars Receiver									Π				
C-645		PMDB Receiver	Ī								Г	<u> </u>		Г	Π
C-651	EQT063	PC Receiver									П				
C-655	EQT064	Guiacol Light Ends Receiver												Г	
C-660	EQT065	Inters./Veratrole Receiver										Π		Г	Г
C-665	EQT066	Second Receiver										Г			
C-670	EQT067	End of Campaign Receiver					<u> </u>	<del></del>				П		П	
C-675	EQT068	Guaiacol Receiver										П		П	
C-683X	EQT234	Guaiacol Vacuum Package Separator													
C-687A/B	EQT235	Guaiacol Distillation Cold Traps													
C-701	EQT069	Crude Veratrole Wash Tank													
C-705	EQT070	Water Guaiacolate Receiver													
C-710	EQT071	Caustic Wash Receiver													
C-751	. EQT072	Veratrole Distillation Kettle												L	
C-754	EQT236	Veratrole Distillation Column	<u> </u>						,					L	
C-765		Light Ends Receiver	L					<u> </u>				L		<u> </u>	L
C-770		Distilled Veratrole Receiver	L									L		L	
C-783X	EQT237	Veratrole Vacuum Separator	L									L	<u> </u>		
C-787	EQT238	Veratrole Distillation Cold Traps	<u> </u>									L		上	L
203		Baghouse for HQ/PC Handling	L				ļ		<u> </u>			<u> </u>	<u> </u>	丄	L
301		Phenolic Reactors Vent Scrubber C-209	╙			<u> </u>	<u>.</u>					上	$oxed{oxed}$	Ŀ	L
C-213	EQT239	First Reactor	L										$oxed{oxed}$	上	L
C-215	EQT240	Second Reactor (vents indirectly via 1st												l	
		reactor)	<u> </u>									L	$oxed{oxed}$	<u> </u>	
C-217	EQT241	Third Reactor (vents indirectly via 1st												l	
		reactor)										L		L.	
C-219	EQT242	Fourth Reactor (vents indirectly via 1st												1	1
		reactor)	<u> </u>			<u> </u>					Ц_	丄	<b>⊥</b>	L	L
C-223	EQT077	Phenol Drain Tank Reaction Surge Drum				<u> </u>				L	<u> </u>	<u></u>	Щ.	$\perp$	L
C-231	EQT243	Fifth Reactor (vents indirectly via 1st									1			1	1
		reactor)		<u> </u>							$oldsymbol{ol}}}}}}}}}}}}}$	L	<u> </u>	丄	L
C-416	EQT078	Predephenol Reflux Drum													Ĺ
C-501	EQT244	Detarring Column, vents via H-524													
C-508	EQT079	Vertical Tar Diluter	Г												Γ

#### ATON ROUGE FACILITY IA, INC. N ROUGE PARISH, LOUISIANA

# FEDERAL AIR QUALITY REQUIREMENTS

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2		68	CFR							LAC 3	J.III						LA	C 33	.111.0	,nap	ıter
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#### CATHYVAL PLANT - E RHOI BATON ROUGE, EAST BATO

# **TABLE 1: APPLICABLE LOUISIANA AN**

Source ID	TEMPO ID	Descriptive Name of Source					ISP CFF	S R 60				SH S O C			S
No:		. *	Α	Ka	Kb+	vv		NNN	RRR	YYY				Α	
C-521	EQT245	Final Dephenoling Column, vents via H-524													_
C-530		Distillation Drain Tank													
C-532	EQT081	Tails Surge Drum													
E-418		Phenol Condenser			<u> </u>										
E-506	need	Detarring Condenser													
H-524		Vacuum System									Г				
302		OSBL Tank Farm Scrubber C-319													
C-113		Phenol Unloading Tank													
D-107		Washwater Tank			2										
D-111		Phenol Make-Up Tank	П		2										
D-115		Washwater/Guaiacol Tank	П		2										
D-204		Recycle Phenol Tank	П										-	Н	
D-315		Raffinate Tank													
E-318	need	Predephenoling Vent Condenser				<u> </u>								Н	
303		IPE Solvent Vent Scrubber C-402	П				$\vdash$				П			Н	
C-301		Water Stripper, vents via E-401	П								П				
C-308		IPE Settler	П												
C-311		Wash Water Drum	П												
C-313		Extraction Column, vents via E-401	П								П				
C-320		IPE Storage Tank									Н				
C-322		Ether Drain Tank						***************************************			Н				_
C-405	EQT250	Dehydration Column, vents via E-408 and E-401													
E-401	EQT251	Solvent Vent Condenser													
304	EQT0094	PC Flaker Vent Scrubber C-561				· · · · ·									
C-536	EQT252	Splitter Column (PC/HQ Separation), vents via H-545													
C-551	EQT095	PC Receiving Drum													
C-563	****	PC Flaker Feed Tank									П			П	
H-545		Vacuum System	П								П				
S-560		PC Flaker (Intermittent, for S/D only)													
306		Seal Pot D-669 for Crystallization	П								П				
C-650		Reflux Surge Drum													
D-607		HQ Dissolver Tank													
D-610		HQ Surge Tank									П			П	
D-612		Carbon Treater Tank	П											П	
D-632		Crystallization Surge Tank	П								П			П	
D-652		Mother Liquor Surge Tank									П				
D-653		Conc. Column Feed Tank									П				
D-657		Mother Liquor Surge Drum												П	
D-681		Screener Residue Dissolver				l					П			$\neg$	_
H-640		Vacuum System for Crystallizers	П								П			П	_
307	EQT0106	Sulfite Metabisulfite Bag Dump Station Baghouse S-603 for D601													
308	EQT0107	Oxalic Acid Bag Dump Station Baghouse S-663 for D660													

#### ATON ROUGE FACILITY A, INC. N ROUGE PARISH, LOUISIANA

# FEDERAL AIR QUALITY REQUIREMENTS

4		40 CFR								LAC 3	3:111						LA	C 33	:III.C	Chap	oter
3 F	64_	68	70	82	1303.	1311.	1311. C	1313.	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	E.C.	59
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**TABLE 1: APPLICABLE LOUISIANA ANI** 

Source ID	TEMPO ID	Descriptive Name of Source				_	ISP CFF	S R 60				S	IAP FR	F	ESI PS 4
No:			Α	Ka	Kb+	vv	III	NNN	RRR	YYY					FF
310	EQT0109	Carbon Bag Dump Station Baghouse S- 615 for D618													
311		PC Packaging Baghouse Y-731													
312		HQ Packaging Baghouse Y-716													
313	EQT0112	HQ Rework Dumper Baghouse S-693													
316	EQT0115	Pressure Leaf Filter Drying Vent Y-625													
317	EQT0116	Vacuum Clean-Up Packaging Baghouse Y-760X													
315A	EQT0113	Fluid Heater F-962 (Back-up)													
315B	EQT0114	Primary Fluid Heater F-971													
F-6C	FUG0004	Cathyval Fugitive Emissions (Cathy Unit)				1									
F-6D	FUG0005	Cathyval Fugitive Emissions (Daphne Unit	t)			2									
F-6V	FUG0001	Cathyval Fugitive Emissions (Vanessa Un	it)			2									
M-5	EQT0125	Cathy (E925) and Vanessa (E907) Cooling Towers													
M-6	EQT0126	CathyVal Sumps													
wwT	GRP0014	Emissions CAP - Wastewater Treatment Plant													
2, 3	GRP0002	Sulfuric Acid Units No. 1 and No. 2 *													
C-101		IPE Solvent Storage Tank													
C-132		MeCl Storage Tank													
C-136		EtCl Storage Tank													
C-251		Batch Reactor													
C-301	EQT135	Acidification/Decantation Tank													
C-351	EQT128	RAG Layer Diverting Tank													
C-352		RAG Layer Surge Tank													
C-401		Aqueous Phase Surge Tank													
C-451		Extraction Column													
C-461		Aqueous Effluent Tank									П				
C-501	EQT258	Deetheration Column													
C-503		Deetheration IPE Decanter													
C-511		Deetheration Guaiacol Decanter	$\neg$										***************************************		
C-521		Organic Phase Surge Tank	$\neg$												
C-551		Crude Guaiacol Dehydration Column													
C-555		Wet Guaiacol Tank	一												

<sup>\*</sup> Sulfuric Acid Unit No. 1 (EIQ I.D. 3) and Sulfuric Acid Unit No. 2 (EIQ I.D. 2) are included in a separate Title V permit 0840-00 + Vessels with a blank for NSPS Kb are "process tanks" per NSPS Kb definition and/or are less than 19,800 gals such that Kb Vessels with a "2" are potentially subject to NSPS Kb, but are not currently subject due to vapor pressure of stored material.

#### KEY TO MATRIX

- 1 (Applicable) The regulations have applicable requirements that apply to this particular emissions source. This includes any m
- 2 (Exempt) The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not a
- 3 (Does Not Apply) The regulations do not apply to this emissions source. The regulations may have applicable requirements

Blank - The regulations clearly do not apply to this type of emission source.

#### ATON ROUGE FACILITY A, INC. N ROUGE PARISH, LOUISIANA

#### FEDERAL AIR QUALITY REQUIREMENTS

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A	40	40	40	40																	
	CFR	CFR	CFR	CFR						LAC 3	3:III						LA	C 33	3:III.C	Chap	ter
3	64	68	70	82	-																
F					1303.	1311. B	1311.	1313.	2402	2407	2444	2112	2115	21/17	24/10	2453					
					В	В	С	С	2103	2107	2111	2113	2113	2141	2.143	2133	9	11	51	56	59
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33-V2 issued 11-30-09.

vould not apply regardless of contents.

nitoring, recordkeeping, or reporting requirements.

oply to this particular emission source.

at could apply to this emissions source but the requirements do not currently apply to the source due to meeting a specific criterion, such as

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
1			LAC 33:III.Chapter 9	Requirements that specify reports to be submitted -			
				Submit annual emission inventory reports to the Office of Environmental Assessment by March 31 of each year (for the previous calendar year).	LAC 33:III.919	Annual	no
		-		The unauthorized discharge of any air pollutant into the air shall be reported in accordance with the providsions of LAC 33:I.Chapter 39.	LAC 33:III.927		no
		and the second s	LAC 33:III.Chapter 11	Requirements that limit emissions or operations - Emissions of smoke which passes onto or across a public road and creates a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensifies an existing traffic hazard condition is prohibited.	LAC 33:III.1103	N/A	no
Facility	GRP0011			Outdoor burning is prohibited.	LAC 33:III.1109	N/A	no
			LAC 33:III.Chapter 13	Requirements that limit emissions or operations - Emissions of particulate matter which pass onto or across a public road and create a traffic hazard are prohibited.	LAC 33:III.1303.B	N/A	no
			LAC 33:III.Chapter 21	Requirements that limit emissions or operations - Best practical housekeeping and maintenance practices must be maintained at the highest possible standards to reduce the quantity of organic compounds emissions. Emission of organic compounds must be reduced wherever feasible. Good housekeeping includes the practices listed in LAC 33:2113.A.1 - 5. Develop wirtten plan for VOC housekeeping and maintenance placing emphasis on the prevention or reduction of VOC emissions from the facility.	LAC 33:III.2113	N/A	no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
			LAC 33:III.Chapter 51	Requirements that limit emissions or operations -			
***************************************				After December 20, 1991, no owner or operator of any major source shall cause a violation of any ambient air standard listed in LAC 33:III.5112, Table 51.2, unless operating in accordance with LAC 33:III.5109.B.	LAC 33:III.5105.A.2		yes
			LAC 33:III.Chapter 51	Requirements that specify records to be kept and requiremen	ts that specify record reten	tion time -	
				Demonstrate compliance with the applicable Ambient Air Standards (AAS) for TAPs with emissions higher than the applicable MER. Emissions of MIBK are higher than the MER. Modeling report submitted March 2005 demonstrating compliance.	LAC 33:III.5109.B		yes
				Requirements that specify reports to be submitted -			- <b>!</b>
				Submit a completed annual emissions report identifying the quantity of emissions in the previous calendar year for any TAP emitted.	LAC 33:III.5107.A	Annual	yes
Facility	GRP0011	<u>.</u>		Submit discharge reports for discharges which cause emergency conditions, unauthorized discharges, and control device bypass discharges as specified in this subsection.	LAC 33:III.5107.B	N/A	yes
			LAC 33:III.Chapter 56	Requirements that specify records to be kept and			
				requirements that specify record retention time - Develop and maintain standby plans for emission reductions during emergeny episodes.	LAC 33:III.5609	N/A	no
				Requirements that specify reports to be submitted -			
				Standby plans as required by this Section shall be available to the administrative authority upon request. Any company asked to furnish a standby plan to the administrative authority shall have 30 days from the date of request to submit a plan.	LAC 33:III.5611	N/A	no
			LAC 33:III.Chapter 59	Requirements that limit emissions or operations -			
				Have a chemical accident prevention and minimization program as required in this part.	LAC 33:III.5907		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
			40 CFR 68	Requirements that specify reports to be submitted -			
				Have a chemical accident prevention and minimization program as required in this part.	40 CFR 68		no
			40 CFR 70	Requirements that specify reports to be submitted -			
Facility	GRP0011			Submit Title V monitoring reports and excess emission reports.	40 CFR 70.6(a)(3)(iii)(A)	semiannual	no
				Submit annual Title V certification.	40 CFR 70.6(c )(5)(iv)	annual	no
			40 CFR 82	Requirements that limit emissions or operations -			
				Comply with applicable provisions of proection of stratospheric ozone.	40 CFR 82		no
		404	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	nts that specify record retent	ion time -	
D-148	EQT010	101	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.i		no
	507044	404	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	nts that specify record retent	ion time -	
D-149	EQT011	101	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
D 450	E07040	404	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	ents that specify record retent	ion time -	
D-152	EQT012	101	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
5 450	F07040	101	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	ents that specify record retent	ion time -	
D-153	EQT013	101	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -			
D 460	EQT014	101	LAC 33:III Chapter 21 -	Equip with submerged fill pipe.	LAC 33:III.2103.A		no
D-169	EQ1014	1 101	Storage of VOCs	Requirements that specify records to be kept and requirement	ents that specify record retent	tion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
D 407	EQT0016	102	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	ents that specify record retent	tion time -	
D-107	EQ10016	102	Storage of VOCs	Keep records specified in LAC 33:111.2103.1.	LAC 33:III.2103.I		no
D 444	EQT0017	102	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme		tion time -	
D-111	EQ10017	102	Storage of VOCs	Keep records specified in LAC 33:III.2103.1.	LAC 33:III.2103.I		по
D-113	EQT0018	102	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme		tion time -	····•
טיוו-ט	EQ10010	102	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
				Requirements that specify records to be kept and requirer	nents that specify record reten	tion time -	
C-202	EQT188	103	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and requirer	nents that specify record reten	tion time -	
C-207	EQT189	103	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	<b></b>	no
C-216	EQT020	103	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirer	nents that specify record reten	tion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
Ì			L A O 00-III Ob t 24	Requirements that specify records to be kept and requirer	nents that specify record reten	tion time -	
C-217	EQT190	103	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	***	no
			1400000000	Requirements that specify records to be kept and require	nents that specify record reten	tion time -	
C-219	EQT191	103	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			1.4.0.00.111.01	Requirements that specify records to be kept and require	ments that specify record reten	tion time -	
C-221	EQT192	103	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			1400011101 4 04	Requirements that specify records to be kept and require	ments that specify record reten	tion time -	
C-223	EQT193	103	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			L A O CO.III OL 4 - 04	Requirements that specify records to be kept and require	ments that specify record reten	tion time -	
C-225	EQT194	103	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			LAC 20-III Chanta- 04	Requirements that specify records to be kept and require	ments that specify record reter	tion time -	
C-227	EQT195	103	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no

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C-236	EQT022	104	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
C-230	EQ1022	104	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
C-240	EQT023	104	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
C-240	EQ1025	104	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
			LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
C-241	EQT196	104	Waste Gas Disposal	Maintain records to demonstrate exemption as	LAC 33:III.2115.K.4	~~	no
			Waste Cas Disposal	specified in LAC 33:III.2115.K.4.			
			LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
C-243	EQT024	104	Waste Gas Disposal	Maintain records to demonstrate exemption as	LAC 33:III.2115.K.4		no
			Tracto Cao Diopocal	specified in LAC 33:III.2115.K.4.			
C-244	EQT025	104	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
0-2-7	EG 1020	107	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
		1	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
C-245	EQT197	104	Waste Gas Disposal	Maintain records to demonstrate exemption as	LAC 33:III.2115.K.4	=-	no
			Waste Cas Bispecal	specified in LAC 33:III.2115.K.4.			
			LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
C-247	EQT027	104	Waste Gas Disposal	Maintain records to demonstrate exemption as	LAC 33:III.2115.K.4		no
			Tradic Cas Disposal	specified in LAC 33:III.2115.K.4.			

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				Requirements that specify records to be kept and requiren	nents that specify record reten	tion time -	
C-249	EQT026	104	LAC 33:III Chapter 21 - Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that specify records to be kept and requiren	nents that specify record reten	tion time -	•
C-301	EQT198	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	77.57	no
			1.000.000.00	Requirements that specify records to be kept and requiren	nents that specify record reten	tion time -	
C-306	EQT199	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			L A C 20-UL Charles 24	Requirements that specify records to be kept and requiren	nents that specify record reten	tion time -	
C-312	EQT200	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requiren	nents that specify record reten	tion time -	
C-314	EQT201	104	Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			L A C 22-111 Chamter 24	Requirements that specify records to be kept and requiren	nents that specify record reten	tion time -	
C-316	EQT202	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			LAG COULT Observe CA	Requirements that specify records to be kept and requiren	nents that specify record reten	tion time -	•
C-320	EQT203	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and requiren	nents that specify record reten	tion time -	
C-322X	EQT204	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and requirer	nents that specify record reten	tion time -	
H-317	EQT205	104	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	<del></del>	no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
				Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21 - Storage of VOCs	Equip with a vapor loss control system that is ≥ 95% efficient for VOCs. This scrubber controls emissions from 4 tanks that are subject to LAC 33:III.2103.A. Overall ≥ 95% DRE is achieved by condenser and scrubber operating in series.	LAC 33:III.2103.A		no
				Requirements that specify records to be kept and requiremen		tion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -			
106	EQT0031	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Non-halogenated hydrocarbons shall be burned at 1600°F for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices will be acepted provided 98% or greater VOC destruction or removal efficiency can be demonstrated. Overall ≥98% DRE is achieved by condenser E-428 and scrubber C-427 (EPN 106) operating in series. Does not apply when oxidation/neutralization section is shut down.  **Requirements that specify monitoring - Install and maintain monitors to accurately measure and record operation parameters of all required control devices as necessary to ensure the proper functioning	LAC 33:III.2115.B		no
				of those devices in accordance with the design specifications, including but not limited to the parameters listed in LAC 33:III.2115.J.2.  Requirements that specify records to be kept and requirement Maintain records as required in LAC 33:III.2115.K.  Requirements that limit emissions or operations -	nts that specify record reter LAC 33:111.2115.K	tion time - 	no
				Equip with a vapor loss control system.	LAC 33:III.2103.A	T	no
C-421	EQT032	106	LAC 33:III Chapter 21 - Storage of VOCs	Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E		no
	ĺ		-	Requirements that specify records to be kept and requireme	nts that specify record reter	ntion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
	***************************************			Requirements that limit emissions or operations -			
C-429	EQT208	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Control of VOC by ≥ 98% DRE achieved with condenser E-428 and scrubber C-427 (EPN 106) in series.	LAC 33:III.2115.B		no
				Requirements that limit emissions or operations -			
C-430	EQT033	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Control of VOC by ≥ 98% DRE achieved with condenser E-428 and scrubber C-427 (EPN 106) in series.	LAC 33:III.2115.B		no
				Requirements that limit emissions or operations -		•	
				Equip with a vapor loss control system	LAC 33:III.2103.A		no
C-432	EQT034	106	LAC 33:III Chapter 21 - Storage of VOCs	Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	ition time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
			LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	nts that specify record reter	ition time -	
C-434	EQT035	106	Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			LAC 22:III Chantar 24	Requirements that specify records to be kept and requireme	nts that specify record reter	ntion time -	
C-435	EQT209	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			L A C 00-111 Classification Of	Requirements that specify records to be kept and requireme	nts that specify record reter	ntion time -	
C-440	EQT210	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that limit emissions or operations -			•
				Equip with a vapor loss control system .	LAC 33:III.2103.A		no
C-441	EQT036	106	LAC 33:III Chapter 21 - Storage of VOCs	Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E		no
			_	Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	•
		1		Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -			
				Equip with a vapor loss control system .	LAC 33:III.2103.A		no
C-501	EQT031	106	LAC 33:III Chapter 21 - Storage of VOCs	Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E		no
			_	Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no

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			1 A O 00-111 Objects a 04	Requirements that specify records to be kept and requirer	nents that specify record reter	tion time -	
C-504	EQT211	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			****	Requirements that specify records to be kept and require	nents that specify record reter	tion time -	
C-507	EQT212	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and require	ments that specify record reter	tion time -	<del></del>
C-516	EQT213	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
		<b>-</b>		Requirements that specify records to be kept and require	ments that specify record reter	tion time -	!
C-533X	EQT214	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			LAC 33:III Chapter 21 -	Requirements that specify records to be kept and require	ments that specify record reter	ition time -	
C-558	EQT038	106	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that specify records to be kept and require	ments that specify record reter	ition time -	
C-565	EQT215	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
		-		Requirements that specify records to be kept and require	ments that specify record rete	ntion time -	<u> </u>
C-568	EQT216	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	=-	no
		†		Requirements that specify records to be kept and require	ments that specify record rete	ntion time -	•
C-575	EQT039	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		по

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
				Requirements that limit emissions or operations -			
E-428	EQT031	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Control of VOC by ≥ 98% DRE achieved with condenser E-428 and scrubber C-427 (EPN 106) in series.	LAC 33:III.2115.B		no
				Requirements that specify records to be kept and requirements	ents that specify record reten	tion time -	
H-520	EQT218	106	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
C-525	EQT219	107	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	<b></b>	no
				Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	•
C-529	EQT220	107	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
0.505	EQT041	407	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reter	tion time -	
C-535	EQ1041	107	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
			LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reter	tion time -	
C-545	EQT221	107	Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			LAC 22:11 Charter 24	Requirements that specify records to be kept and requirem	ents that specify record reter	tion time -	
C-555A/B	EQT222	107	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			L A C 22.111 Cht 24	Requirements that specify records to be kept and requirem	ents that specify record reter	ntion time -	
C-562X	EQT223	107	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
0.646	EOT040	107	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reter	ition time -	
C-616	EQT042	107	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:111.2103.1		no
				Requirements that specify records to be kept and requirem	ents that specify record reter	ntion time -	
C-648	EQT043	107	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
	FOTO44	407	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reter	ntion time -	
C-655	EQT044	107	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no

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			LAC 22dll Chantes 2d	Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
H-556	EQT224	107	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that limit emissions or operations -			
108	EQT0045	108	LAC 33:III Chapter 21 - Storage of VOCs	Equip with a vapor loss control system that is ≥ 95% efficient for VOCs. This scrubber controls emissions from 2 tanks that are subject to LAC 33:III.2103.A.	LAC 33:III.2103.A		no
				Requirements that specify records to be kept and requireme		ition time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
C-541	EQT046	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
		<del> </del>		Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	,-1
C-603	EQT048	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
C-606	EQT049	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that limit emissions or operations -	<u> </u>		•
				Equip with a vapor loss control system .	LAC 33:III.2103.A		no
C-617	EQT050	108	LAC 33:III Chapter 21 - Storage of VOCs	Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E		no
				Requirements that specify records to be kept and requireme	ents that specify record rete	ntion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that specify records to be kept and requireme	ents that specify record rete	ntion time -	
C-634X	EQT225	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	***	no

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				Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
C-637X	EQT226	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and requireme	ents that specify record reten	ition time -	
C-640	EQT227	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			***	Requirements that limit emissions or operations -		1	
				Equip with a vapor loss control system .	LAC 33:III.2103.A		no
C-801	EQT047	108	LAC 33:III Chapter 21 - Storage of VOCs	Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E		no
				Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
				Keep records specified in LAC 33:III.2103.1.	LAC 33:III.2103.I		no
			LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme		ition time -	
C-805	EQT228	108	Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
H-619	EQT229	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			L A O 00-III Obt 04	Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
Y-620	EQT230	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
		<u> </u>	L & O OD. III Ob	Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
Y-621	EQT231	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33;III.2115.K.4		no
	1			Requirements that specify records to be kept and requireme		ntion time -	
Y-640	EQT232	108	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	<del></del>	no

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109	EQT0051	109	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	Requirements that limit emissions or operations - Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B		no
				Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	<b>!</b>
110	EQT0139	110	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	<b>.</b> ,
C-407	EQT206	111	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
C-409	EQT029	111	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
C-409	EQ1029		Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that specify records to be kept and requirem		tion time -	1
C-416	EQT207	111	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
				Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
D-417	EQT030	111	LAC 33:III Chapter 21 - Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
D 444	FOTOGO	004	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
D-111	EQT053	201	Storage of VOCs	Keep records specified in LAC 33:III.2103.1.	LAC 33:III.2103.I		no
D-128	EQT054	201	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirem Keep records specified in LAC 33:III.2103.I.	ents that specify record reten	tion time -	no
		904	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem		ition time -	
D-141	EQT055	201	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
				Requirements that limit emissions or operations -			
	#O#057	000	LAC 33:III Chapter 21, Subchapter K - Limiting	The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1		no
C-201	EQT057	202		Use the RACT equation specified in LAC 33LIII.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f		no
				Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
				Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1		no
				Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
C-553	EQT058	202	LAC 33:III Chapter 21 - Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	<u>'</u>
C-561	EQT059	202	LAC 33:III Chapter 21 - Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21, Subchapter K - Limiting	The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1		no
C-603	EQT060	202		Use the RACT equation specified in LAC 33LIII.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f		no
			_	Requirements that specify records to be kept and requirements	ents that specify record reten	tion time -	
				Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1		no
				Requirements that limit emissions or operations -			
	F07000	202	LAC 33:III Chapter 21, Subchapter K - Limiting	The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1	ana.	no
C-606	EQT233	202	VOC Emissions from Batch Processing	Use the RACT equation specified in LAC 33LIII.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f		no
				Requirements that specify records to be kept and requirem	ents that specify record reten	tion time -	
				Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1		no
C-615	EQT061	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirem Keep records specified in LAC 33:III.2103.I.	ents that specify record reten	ntion time -	no
C-645	EQT062	202	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirem Keep records specified in LAC 33:III.2103.I.	ents that specify record reten	ntion time - 	no
	Болосс	1	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reter	ition time -	
C-651	EQT063	202	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
C-655	EQT064	202		Requirements that specify records to be kept and requireme		tion time -	
0-000	2001004	202		Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
1			LAC 33 III CDADIECZI ~	Requirements that specify records to be kept and requireme		tion time -	1
C-660	EQT065	202	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
C-665	EQT066	202	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
G-000	EQTUBB	202	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
C-670	EQT067	202	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme		tion time -	
U-6/U	EQ1067	202	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
C-675	EQT068	202	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme		tion time -	
C-0/3	EQ1000	202	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -			
				The required 90% control for the pool of non-exempt	LAC 33:III.2149.C.1		no
			LAC 33:III Chapter 21,	batch process vents is achieved by controlling C-251			
0 0000	FOTO:	202	Subchapter K - Limiting	and C-301 with >99% DRE.			
C-683X	EQT234	202	VOC Emissions from Batch	Use the RACT equation specified in LAC	LAC 33:III.2149.C.2.f		no
			Processing	33LIII.2149.C.1 as applicable.			
				Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
				Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1		no
				Requirements that limit emissions or operations -			
				The required 90% control for the pool of non-exempt	LAC 33:III.2149.C.1		no
			LAC 33:III Chapter 21,	batch process vents is achieved by controlling C-251			
00746	БОТООБ	000	Subchapter K - Limiting	and C-301 with >99% DRE.			
C-687A/B	EQT235	202	VOC Emissions from Batch	Use the RACT equation specified in LAC	LAC 33:III.2149.C.2.f		no
			Processing	33LIII.2149.C.1 as applicable.			
				Requirements that specify records to be kept and requirem		tion time -	
				Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1		no
			LAC 33:III Chapter 21,	Requirements that specify records to be kept and requirem	ents that specify record reten	ition time -	
C-701	EQT069	202	Subchapter K - Limiting	Maintain records for exempt sources as required in	LAC 33:III.2149.G.1		no
			VOC Emissions from Batch				
			LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem	ents that specify record reter	tion time -	
C-705	EQT070	202	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
			Storage of vood	·		<u></u>	
C 740	EOT074	202	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requirem		ition time -	
C-710	EQT071	202	Storage of VOCs	Keep records specified in LAC 33:III.2103.1.	LAC 33:III.2103.I		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
			LAC 33:III Chapter 21,	Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
C-751	EQT072	202	, · · · · · · · · · · · · · · · · · · ·	Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1		no
			LAC 33:III Chapter 21,	Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
C-754	EQT236	202	Subchapter K - Limiting VOC Emissions from Batch	Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1		no
0.705	EOT072	202	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
C-765	EQT073	202	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
C-770	EQT074	202	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
G-770	EQ1074	202	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
			LAC 33:III Chapter 21,	Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
C-783X	EQT237	202	Subchapter K - Limiting VOC Emissions from Batch	Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1		no
			LAC 33:III Chapter 21,	Requirements that specify records to be kept and requireme	ents that specify record reten	tion time -	
C-787	EQT238	202	, ,	Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1		no
			LAC 33:III Chaper 13 -	Requirements that limit emissions or operations -			
203	EQT0075	203	Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
				Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2		no
C-213	EQT239	301	Emissions from SOCMI	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
	1			Requirements that specify records to be kept and requireme	nts that specify record reten	ion time -	•
				Maintain records as required in LAC 33:III.2147.F.1.d.v.			no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
	-			Requirements that limit emissions or operations -			
	5.000	and the state of t	LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC	LAC 33:III.2147.C.2		no
C-215	EQT240	301	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
		1		Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v		no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
		1		Requirements that limit emissions or operations -			
				Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC	LAC 33:III.2147.C.2		no
C-217	EQT217	301	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	•
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v		no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
				Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	<del></del>	no
C-219	EQT242	301	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
				Requirements that specify records to be kept and requireme	nts that specify record reter	tion time -	
			1	Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v		no
1	1		1		LAC 33:III.2147.F.2		1

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
			1 AO 22-III Obastas 24	Requirements that specify records to be kept and requiremen	nts that specify record reten	tion time -	
C-223	EQT077	301	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	44	no
				Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC 301 Emissions from SOCMI Reactor Processes and Distillation Operations	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.		-14	no
C-231	EQT243	301		Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7	<u>-</u>	no
				Requirements that specify records to be kept and requiremen	nts that specify record reten	tion time -	
				Maintain records as required in LAC 33:III.2147.F.1.d.v.			no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
C-416	EQT078	301	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
0.504	FOTOM	1	Subchapter 3 - Limiting VOC		LAC 33:III.2147.C.2		no
C-501	EQT244	301	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		, no
				Requirements that specify records to be kept and requiremen	nts that specify record retent	tion time -	
				Maintain records as required in LAC 33:III.2147.F.1.d.v.			no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
	1	<u> </u>	1 4 0 00 111 01 t 04	Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
C-508	EQT079	301	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	T-	no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
				Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2		no
C-521	EQT245	301		Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
				Maintain records as required in LAC 33:III.2147.F.1.d.v.			no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33;III.2147.F.2		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
C-530	EQT080	301	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			1.40.00.00.00.00.00	Requirements that specify records to be kept and requireme	nts that specify record reter	ition time -	
C-532	EQT081	301	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33;III.2115.K.4		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Requirements that limit emissions or operations - Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2		no
E-418	EQT246	301	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III,2147.D.7		no
				Requirements that specify records to be kept and requireme	ats that specify record reten	tion time -	
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v		no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
		<del> </del>		Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2		no
E-506	need	301	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	1
				Maintain records as required in LAC 33:III.2147.F.1.d.v.			no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
H 504			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Requirements that limit emissions or operations - Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2	<del>-</del>	no
H-524	EQT247	301	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	***	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
				Requirements that limit emissions or operations -			
				Non-halogenated hydrocarbons shall be burned at 1600°F for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices will be acepted provided 98% or greater VOC destruction or removal efficiency can be demonstrated. 98% is achieved with condenser E-318 and scrubber C-419 (EPN 302) operating in series.	LAC 33:III.2115.B	<u></u>	no
202	EQT0082	302	LAC 33:III Chapter 21 -	Requirements that specify monitoring -			
302	EQ10002	302	Waste Gas Disposal	Install and maintain monitors to accurately measure and record operation parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with the design specifications, including but not limited to the parameters listed in LAC 33:III.2115.J.2.	LAC 33:III.2115.J.2		no
				Requirements that specify records to be kept and requireme		tion time -	
				Maintain records as required in LAC 33:III.2115.K.	LAC 33:III.2115.K		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
C-113	EQT083	302	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirement Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
D-107	EQT084	302	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirement Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
D-111	EQT085	302	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirements.  Keep records specified in LAC 33:III.2103.I.	nts that specify record reten	tion time - 	l no
D-115	EQT086	302	LAC 33:III Chapter 21 - Storage of VOCs	Requirements that specify records to be kept and requirement.  Keep records specified in LAC 33:III.2103.I.		tion time -	T no
D-204	EQT088	302	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requirement Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	nts that specify record reten LAC 33:III.2115.K.4	tion time - 	no
D-315	EQT087	302	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that limit emissions or operations - Control of VOC by ≥ 98% DRE achieved with condenser E-318 and scrubber C-319 (EIQ 302) in series.	LAC 33:III.2115.B		no
E-318	need	302	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that limit emissions or operations - Condenser is part of the required control scheme for D- 315 (EQT087)	LAC 33:III.2115.B		no
303	EQT0089	303	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMi	Requirements that limit emissions or operations - Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.	LAC 33:111.2147.C.2		yes
			Reactor Processes and Distillation Operations	Requirements that specify monitoring - Install, calibrate, maintain and operate monitoring device(s) to demonstrate compliance with the TRE index limit. Per letter dated April 24, 2006, LDEQ has approved alternative monitoring of minimum scrubber water flow rate which is already included as a specific requirement in the permit.	LAC 33:III.2147.E.4.a		yes

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
				Requirements that limit emissions or operations -			
				Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.			no
C-301	EQT248	303	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.		no	
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	•
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v	40	no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
			1.40.00.00.00	Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
C-308	EQT091	303	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			LAC 22dll Chapter 24	Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
C-311	EQT092	303	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no

	Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
ľ					Requirements that limit emissions or operations -			
				LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.	LAC 33:III.2147.C.2		no
	C-313	EQT249	303	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
ı					Requirements that specify records to be kept and requiremen	nts that specify record reten	tion time -	•
					Maintain records as required in LAC 33:III.2147.F.1.d.v.			no
					Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
İ				LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
	C-320	EQT090	303	Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
ſ				LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme		tion time -	
	C322	EQT093	303	Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Requirements that limit emissions or operations - Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.	LAC 33:III.2147.C.2		no
C-405	EQT250	303	Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
		<u> </u>		Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	•
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v		no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2	~~	no
				Requirements that limit emissions or operations -			•
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE>1 with the use of recovery devices (condenser/scrubber); alternative monitoring has been approved.	LAC 33:III.2147.C.2		no
E-401	EQT251	303	Emissions from SOCMI	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
				Maintain records as required in LAC 33:III.2147.F.1.d.v.			no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
				Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.			no
C-536	EQT252	304	304 Emissions from SOCMI Reactor Processes and Distillation Operations	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33;III.2147.D.7		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
				Maintain records as required in LAC 33:III.2147.F.1.d.v.	LAC 33:III.2147.F.1.d.v		no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
			LAC 00:111 Ch = 14= 104	Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
C-551	EQT095	304	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			LAC 22:III Chapter 24	Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
C-563	EQT096	304	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC	Requirements that limit emissions or operations - Mainfain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. TRE index value is > 4.0 before any recovery/control devices, using engineering assessment as allowed by LAC 33:III.2147.D.1.	LAC 33:III.2147.C.2		no
H-545	EQT253	304	Emissions from SOCMI	Recalculate the flow rate, TOC concentration, and TRE index value as required. Use the methods and procedures in LAC 33:III.2147 for recalculations.	LAC 33:III.2147.D.7		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
				Maintain records as required in LAC 33:III.2147.F.1.d.v.			no
				Maintain records as required in LAC 33:III.2147.F.2.	LAC 33:III.2147.F.2		no
		<del> </del>		Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
S-560	EQT254	304	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			LAC 22.III Chantar 24	Requirements that specify records to be kept and requireme		ition time -	
C-650	EQT098	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33;III.2115.K.4		no
			L A C 00:111 Ob	Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
D-607	EQT099	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4	***	no
			L A C 202111 Ch ==+== 04	Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
D-610	EQT100	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
			1 A O 00:III Oberster 04	Requirements that specify records to be kept and requirement		ntion time -	
D-612	EQT101	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no
	1		1 A O 00-111 Ob1 04	Requirements that specify records to be kept and requireme	ents that specify record reter	ntion time -	
D-632	EQT102	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	LAC 33:III.2115.K.4		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
D-652	EQT103	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requireme Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	nts that specify record reten LAC 33:III.2115.K.4	tion time - 	no
D-653	EQT104	306	LAC 33:III Chapter 21 - Waste Gas Disposal	Requirements that specify records to be kept and requireme Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	nts that specify record reten LAC 33:III.2115.K.4	tion time - 	no
D-657	Waste Gas Disposal  LAC 33:III Chapter 21 - Waste Gas Disposal		Waste Cas Disposal	Requirements that specify records to be kept and requireme Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	nts that specify record reten LAC 33:III.2115.K.4	tion time - 	no
D-681			Wasta Gas Disposal	Requirements that specify records to be kept and requireme Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	nts that specify record reten LAC 33:III.2115.K.4	tion time - 	no
H-640				Requirements that specify records to be kept and requirement Maintain records to demonstrate exemption as specified in LAC 33:III.2115.K.4.	nts that specify record reten LAC 33:III.2115.K.4	tion time - 	no
307	EQT0106	307		Requirements that limit emissions or operations -  Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B		no
308	EQT0107	308	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	Requirements that limit emissions or operations -  Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B		no
310	EQT0109	310	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight Rate	Requirements that limit emissions or operations -  Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
311	EQT0110	311	Emission Standards for Particulate Matter; 1311.B - Allowable Rate of Emissions Based on Process Weight	Requirements that limit emissions or operations -  Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of	LAC 33:III.1311.B		no
312	EQT0111	312	Rate  LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B -	LAC 33:III Chapter 13.  Requirements that limit emissions or operations -			
312	EQIUITI	312	Based on Process Weight	Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B		no
313	EQT0112	313	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B -	Requirements that limit emissions or operations -			
313	EQTOTIZ	313		Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B		no
316	EQT0115	316	LAC 33:1ii Chaper 13 - Emission Standards for Particulate Matter; 1311.B -	Requirements that limit emissions or operations -			
316	EQIOTIS	310	Allowable Rate of Emissions Based on Process Weight Rate	Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B	<del></del>	no
247	EOT0440	247	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter; 1311.B -	Requirements that limit emissions or operations -			
317	EQT0116	317	Allowable Rate of Emissions Based on Process Weight Rate	Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
2454	FOT0442	2454	LAC 33:III Chapter 11 - Control of Emissions of Smoke	Requirements that limit emissions or operations - Emissions of smoke shall not exceed 20% average opacity for more than one six minute period in any 60 consecutive minutes.	LAC 33:III.1101.B		no
315A	EQT0113	315A	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter	Requirements that limit emissions or operations - Emissions of PM <sub>10</sub> from fuel burning equipment shall not exceed 0.6 lbs per 10 <sup>6</sup> BTU of heat input.	LAC 33:III.1313.C		
	FOT0444	2450	LAC 33:III Chapter 11 - Control of Emissions of Smoke	Requirements that limit emissions or operations - Emissions of smoke shall not exceed 20% average opacity for more than one six minute period in any 60 consecutive minutes.	LAC 33:III.1101.B		no
315B	EQT0114	315B	LAC 33:III Chaper 13 - Emission Standards for Particulate Matter	Requirements that limit emissions or operations - Emissions of PM <sub>10</sub> from fuel burning equipment shall not exceed 0.6 lbs per 10 <sup>6</sup> BTU of heat input.	LAC 33:III.1313.C		no
				Requirements that limit emissions or operations - All rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions shall be equipped with mechanical seals or other equivalent equipment or means as may be approved by the administrative authority	LAC 33:III.2111.A		no
				Comply with LAC 33:III.2122.C.	LAC 33:III.2122.C		no
F-6C	FUG0004	F-6C	LAC 33:III.Chapter 21 - Subchapter A - Fugitive Emission Control for Ozone	Requirements that specify monitoring - Monitor fugitive components as listed in LAC 33:III.2122.D.1.	LAC 33:III.2122.D.1		no
		Nonattainment Areas	Requirements that specify monitoring - Monitor fugitive components as listed in LAC 33:III.2122.D.3.	LAC 33:III.2122.D.3.		no	
				Requirements that specify records to be kept and requireme			
				Maintain records as required in LAC 33:III.2122.F.  Requirements that specify reports to be submitted -	LAC 33:III.2122.F		l no
				Submit semiannual reports by January 31 & July 31 according to LAC 33:III.2122.F.	LAC 33:111.2122.G		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
F-6D	6D FUG0005 F-6D LAC 33:III.Chapter 21 - Subchapter A - Fugitive Emission Control for Ozone Nonattainment Areas		LAC 33:III.Chapter 21 - Subchapter A - Fugitive Emission Control for Ozone Nonattainment Areas	All rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions shall be equipped with mechanical seals or other equivalent equipment or means as may be approved by the administrative authority	LAC 33:III.2111.A		no
F-6V	F-6V FUG0001 F-6V LAC 33:III.Chapter 21 - Subchapter A - Fugitive Emission Control for Ozone Nonattainment Areas		Subchapter A - Fugitive Emission Control for Ozone Nonattainment Areas	All rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions shall be equipped with mechanical seals or other equivalent equipment or means as may be approved by the administrative authority	LAC 33:III.2111.A		no
M5	EQT0125	M5	Emission Standards for	Requirements that limit emissions or operations - Emissions of PM <sub>10</sub> shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III Chapter 13.	LAC 33:III.1311.B		no
			LAC 33:III, Chapter 21,	Requirements that specify records to be kept and requireme	nts that specify record reten	ntion time -	•
wwT	GRP0014	WWT	Subchapter M - Limiting VOC Emissions from	Maintain records for exempt sources as required in LAC 33:III.2153.F.1.	LAC 33:III.2153.F.1		no
C-101	EQT127	2.3	LAC 33:III Chapter 21 -	Requirements that limit emissions or operations - Equip with a vapor loss control system . Vents to Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840- 00033-V2 for control via combustion.	LAC 33:III.2103.A		no
		_,-	Storage of VOCs	Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E		no
				Requirements that specify records to be kept and requireme	nts that specify record reter	ntion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -	<u> </u>		
0.400	F0T100		LAC 33:III Chapter 21 -	Equip with submerged fill pipe.	LAC 33:III.2103.A		no
C-132	EQT133	2,3	Storage of VOCs	Requirements that specify records to be kept and requireme	nts that specify record reter	ntion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -			
C-136	EQT134	2,3	LAC 33:III Chapter 21 -	Equip with submerged fill pipe.	LAC 33:III.2103.A		no
U-130	EQ1134	2,3		Requirements that specify records to be kept and requireme	nts that specify record reter	ntion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision Compliance Cita		Averaging Period/ Frequency	State Only Requirement
				Requirements that limit emissions or operations -			
0.054	EQT255	2,3	LAC 33:III Chapter 21, Subchapter K - Limiting	The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1		no
C-251	EQ1200	2,3	VOC Emissions from Batch Processing	Use the RACT equation specified in LAC 33LIII.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f		no
				Requirements that specify records to be kept and requiremen	nts that specify record reten	tion time -	
				Keep records as defined in 2149.G.1	LAC 33:III.2149.G.1		no
				Requirements that limit emissions or operations -			
0 004	E07405	0.0	LAC 33:III Chapter 21, Subchapter K - Limiting	The required 90% control for the pool of non-exempt batch process vents is achieved by controlling C-251 and C-301 with >99% DRE.	LAC 33:III.2149.C.1		no
C-301	EQT135	2,3	VOC Emissions from Batch Processing	Use the RACT equation specified in LAC 33LIII.2149.C.1 as applicable.	LAC 33:III.2149.C.2.f		no
		,		Requirements that specify records to be kept and requiremen	nts that specify record reten	tion time -	
				Keep records as defined in 2149.G.1	LAC 33;III.2149.G.1	-	no
			LAC 33:III Chapter 21,	Requirements that specify records to be kept and requiremen	nts that specify record reten	tion time -	
C-351	EQT128	2,3	Subchapter K - Limiting VOC Emissions from Batch	Maintain records for exempt sources as required in LAC 33:III.2149.G.1.	LAC 33:III.2149.G.1		no
				Requirements that limit emissions or operations -			
0.050	FOT400		LAC 33:III Chapter 21 -	Equip with submerged fill pipe.	LAC 33:III.2103.A		no
C-352	EQT130	2,3	Storage of VOCs	Requirements that specify records to be kept and requiremen	nts that specify record reten	tion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -			
C-401	EQT129	2,3	LAC 33:III Chapter 21 -	Equip with a vapor loss control system . Vents to Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2 for control via combustion.	LAC 33:III.2103.A		no
			Storage of VOCs	Vapor loss control system shall reduce inlet emissions of VOC by ≥95%.	LAC 33:III.2103.E		no
				Requirements that specify records to be kept and requireme	nts that specify record reten	tion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
		į.		Requirements that limit emissions or operations -			
C-451	EQT257	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	Control of VOC by ≥ 98% DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B		no

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/ Frequency	State Only Requirement
				Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21 -	Equip with submerged fill pipe.	LAC 33:III.2103.A		no
C-461	EQT131	2,3	Storage of VOCs	Requirements that specify records to be kept and requiremen	its that specify record reten	tion time -	
				Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -			
C-501	EQT258	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	Control of VOC by ≥ 98% DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B	<b></b>	no
				Requirements that limit emissions or operations -			
C-503	EQT136	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	Control of VOC by ≥ 98% DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B	<del></del>	no
				Requirements that limit emissions or operations -			
C-511	EQT259	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	Control of VOC by ≥ 98% DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B	<b></b>	no
				Requirements that limit emissions or operations -			
			LAC 33:III Chapter 21 -	Equip with submerged fill pipe.	LAC 33:III.2103.A		no
C-521	EQT132	2,3	Storage of VOCs	Requirements that specify records to be kept and requirement	nts that specify record reten	tion time -	
			<u>-</u>	Keep records specified in LAC 33:III.2103.1.	LAC 33:III.2103.I		no
				Requirements that limit emissions or operations -			
C-551	EQT260	2,3	LAC 33:III Chapter 21 - Waste Gas Disposal	Control of VOC by ≥ 98% DRE achieved by combustion in Unit 1 (EPN 3) or Unit 2 (EPN 2) furnaces in permit 0840-00033-V2.)	LAC 33:III.2115.B		no
O EEE	EQT261	2.2	LAC 33:III Chapter 21 -	Requirements that specify records to be kept and requireme		tion time -	
C-555	EQ1201	2,3	Storage of VOCs	Keep records specified in LAC 33:III.2103.I.	LAC 33:III.2103.I		no

#### **TABLE 3: MONITORING**

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
			Provisions		No Part 60 standards apply in the CathyVal Plant.	40 CFR 60
			NSPS Part 60 Subpart III - Standards of Performance for VOC Emissions From the SOCMI Air Oxidation Unit Processes		The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.	40 CFR 60.610(a)
			NSPS Part 60 Subpart NNN - Standards of Performance for VOC Emissions from SOCMI Distillation Operations	DOES NOT APPLY.	The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.667 as products, co-products, by-products, or intermediates.	40 CFR 60.660(a)
			NSPS Part 60 Subpart RRR - Standards of Performance for VOC Emissions from SOCMI Reactor Processes		The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.707 as products, co-products, by-products, or intermediates.	40 CFR 60.700(a)
Facility	GRP0011		NSPS Part 60 Subpart YYY - Volatile Organic Compound Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Wastewater (Proposed)	DOES NOT APPLY.	The Cathy, Daphne, and Vanessa units do not produce SOCMI chemicals as primary products. Therefore, they are not affected facilities under NSPS YYY. Hydroquinone is not the primary product of the unit.	
			NESHAP Part 61 Subpart A - General Provisions	DOES NOT APPLY.	No Part 61 standards apply in the CathyVal Plant.	40 CFR 61.01-61.19
			NESHAP Part 61 Subpart M - National Emission Standard for Asbestos	DOES NOT APPLY.	The CathyVal Plant does not contain any asbestos.	40 CFR 61.140-61.157
			NESHAP Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations	DOES NOT APPLY.	The CathyVal Plant does not contain any benzene.	40 CFR 61.340-61.359
			NESHAP Part 63 Subpart A - General Provisions	DOES NOT APPLY.	Rhodia is not a major source of HAPs.	40 CFR 63
			NESHAP Part 63 Subpart FFFF - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing	DOES NOT APPLY.	Rhodia is not a major source of HAPs.	40 CFR 63.2430-63.2550

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
			NESHAP Part 64 - Compliance Assurance Monitoring		threshhold amount of any pollutant.	40 CFR 64
Facility	GRP0011		LAC 33:III Chapter 21, Subchapter L - Limiting Volatile Organic Compound Emissions from Cleanup Solvent Processing	DOES NOT APPLY.	Rhodia does not have any affected cleaning operations according to the definition because the plant does not use solvents with vapor pressure >1.5 psia for cleaning operations.	LAC 33:III.2151
			LAC 33:III Chapter 51 - Comprehensive Toxic Air Pollution Emission Control Program LAC 33:III.5109.A	DOES NOT APPLY.	The CathyVal plant does not emit any class I or class II TAPs for which sitewide emissions exceed the MER.	LAC 33:III.5109.A
			LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY.	The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.	LAC 33:III.2107
101	EQT0009	EQT0009 101	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
D-148	EQT010	101	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-149	EQT011	101	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-152	EQT012	101	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-153	EQT013	101	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY.	The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.	LAC 33:III.2107
102	EQT0015	EQT0015 102	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149

Emission Point ID No.:	TEMPÓ ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
			LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-107	EQT0016	102	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Vapor pressure is less than 0.51 psia.	40 CFR 60.110b(b)
			LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-111	EQT0017	102	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.	40 CFR 60.110b(b)
			LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-113	EQT0018	102	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.	40 CFR 60.110b(b)
103	EQT0019	103	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-202	EQT019	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-207	EQT189	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-216	EQT020	103	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-217	EQT190	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-219	EQT191	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-221	EQT192	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-223	EQT193	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
C-225	EQT194	103	LAC 33:III Chapter 21 - Waste Gas Disposal		Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-227	EQT195	103	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
104	EQT0021	EQT0021 104	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-236	EQT022	104	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-240	EQT023	104	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-241	EQT196	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-243	EQT024	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-244	EQT025	104	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-245	EQT197	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-247	EQT027	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-249	EQT026	104	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-301	EQT198	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-306	EQT199	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-312	EQT200	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-314	EQT201	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-316	EQT202	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-320	EQT203	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
C-322X	EQT204	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
H-317	EQT205	104	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
106	EQT0031	106	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
*** * ** * ** * ** * ** ** ** ** ** **			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-434	EQT035	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-435	EQT209	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-440	EQT210	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-504	EQT211	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-507	EQT212	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-516	EQT213	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-533X	EQT214	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-558	EQT038	106	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-565	EQT215	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-568	EQT216	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-575	EQT039	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
H-520	EQT218	106	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33;III.2115.H.1.c

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
107	EQT0040	107	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
		<u>.</u>	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-525	EQT219	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-529	EQT220	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-535	EQT041	107	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-545	EQT221	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-555A/B	EQT222	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-562X	EQT223	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-616	EQT042	107	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-648	EQT043	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-655	EQT044	107	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
H-556	EQT224	107	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
108	EQT0045	108	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	
		Vanessa is not a batch process.	LAC 33:III.2149			
C-541	EQT046	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-603	EQT048	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-606	EQT049	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
C-634X	EQT225	108	Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-637X	EQT226	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-640	EQT227	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-805	EQT228	108	Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
H-619	EQT229	108	Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
Y-620	EQT230	108	Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33;III.2115.H.1.c
Y-621	EQT231	108	Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
Y-640	EQT232	108	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	period.	LAC 33:III.2115.H.1.c
109	EQT0051	109	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
110	EQT0139	110	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY.	The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.	LAC 33:III.2107
110	EQ10139	110	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
111	new	111	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	
,			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Vanessa is not a batch process.	LAC 33:III.2149
C-407	EQT206	111	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-409	EQT029	111	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-416	EQT207	111	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
			LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-417	EQT030	111	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.	40 CFR 60.110b(b)
			LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY.	The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.	LAC 33:III.2107
201	EQT0052	201	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Daphne does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Although some sections of the Daphne Unit are batch operated, there are no batch process vents routed to this scrubber.	LAC 33:III.2149
			LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-111	EQT053	201	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.	40 CFR 60.110b(b)
D-128	EQT054	201	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-141	EQT055	201	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
			LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	Daphne does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.	LAC 33:III.2147
202	EQT056	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	Exempt	No control is required for the batch process vents venting to the scrubber because the pool of non-exempt batch process vents from the Daphne unit is controlled with overall 90% efficiency utilizing other control equipment.	LAC 33:III.2149.C

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
C-553	EQT058	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-561	EQT059	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-615	EQT061	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-645	EQT062	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-651	EQT063	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-655	EQT064	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-660	EQT065	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-665	EQT066	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-670	EQT067	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-675	EQT068	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-701	EQT069	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b
C-705	EQT070	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-710	EQT071	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-751	EQT072	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b
C-754	EQT236	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b
C-765	EQT073	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-770	EQT074	202	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-783X	EQT237	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
C-787	EQT238	202	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b
203	EQT0075	203	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
301	301 EQT0076	EQT0076 301	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	If it can be demonstrated that a TRE inex value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter	LAC 33:III.2147.C.2
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:III.2149
C-223	EQT077	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-416	EQT078	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-508	EQT079	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-530	EQT080	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-532	EQT081	301	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
302	EQT0082	302	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	There are no distillation or reactor vents routed to this scrubber.	LAC 33:III.2147.A
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:III.2149
C-113	EQT083	302	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
			LAC 33:III Chapter 21 - Storage of VOCs 40 CFR 60 Subpart Kb - Standards of	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia  Vapor pressure is less than 0.51 psia.	LAC 33:III.2103.A 40 CFR 60.110b(b)
D-107	EQT084	302	Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids		vapor pressure is less triair 0.51 psia.	40 OF IC 00.110B(B)
			LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-111	EQT085	302	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Vapor pressure is less than 0.51 psia.	40 CFR 60.110b(b)
			LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
D-115	EQT086	302	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY.	Vapor pressure is less than 0.51 psia.	40 CFR 60.110b(b)
D-204	EQT088	302	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
303	EQT0089	303	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:III.2149
C-308	EQT091	303	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-311	EQT092	303	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:1II.2115.H.1.c
C-320	EQT090	303	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
C-322	EQT093	303	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
304	EQT0094	304	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	If it can be demonstrated that a TRE inex value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter	LAC 33:III.2147.C.2
	·		LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:III.2149
C-551	EQT095	304	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LÁC 33:III.2115.H.1.c
C-563	EQT096	304	LAC 33:III Chapter 21 - Waste Gas Disposal	ЕХЕМРТ.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
S-560	EQT254	304	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
306	EQT0097 306	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY.	There are no distillation or reactor vents routed to this seal pot.	LAC 33:III.2147.A	
			LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY.	Cathy is not a batch process.	LAC 33:111.2149
C-650	EQT098	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-607	EQT099	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-610	EQT100	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
<b>р-612</b>	EQT101	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-632	EQT102	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-652	EQT103	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
D-653	EQT104	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33;III.2115.H.1.c
D-657	EQT105	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
D-681	EQT137	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
H-640	EQT256	306	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT.	Emits less than 100 lb VOC in a 24-hour period.	LAC 33:III.2115.H.1.c
307	EQT0106	307	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
308	EQT0107	308	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
310	EQT0109	310	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
311	EQT0110	311	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
312	EQT0111	312	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E

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Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
313	EQT0112	313	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
316	EQT0115	316	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
317	EQT0116	317	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits		PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
315A	EQT0113	315A	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide		Emissions from this unit are less than 250 tpy; therefore, Rhodia requests exemption from this requirement per LAC 33:III.1503.C.	LAC 33:III.1503.C
315B	EQT0114	315B	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide		Emissions from this unit are less than 250 tpy; therefore, Rhodia requests exemption from this requirement per LAC 33:III.1503.C.	LAC 33:III.1503.C
F-6C	FUG0004	F-6C	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	Exempt	If an affected facility produces heavy liquid chemicals only from heavy liquid feed or raw materials, then it is exempt from §§60.482-1 through 60.482-10.	40 CFR 60.480(d)(3)
F-6D	FUG0005	F-6D	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	DOES NOT APPLY.	No chemicals listed in 40 CFR 60,489 are produced as intermediates or final products at the Daphne Unit.	40 CFR 60.480

Emission Point ID No.:	TEMPO ID	Vents to this EPN ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non- applicability
F-6V	FUG0001	F-6V	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	DOES NOT APPLY.	No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Vanessa Unit.	40 CFR 60.480
M-5	EQT0125	M-5	LAC33:III Chapter 13 - Emission Standards for Particulate Matter; 1311.C - Opacity Limits	Exempt	PM10 emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. Therefore, Rhodia requests exemption from this requirement per LAC 33:III.1311.E.	LAC 33:III.1311.E
M-6	EQT0126	M-6	LAC 33:III, Chapter 21, Subchapter M - Limiting VOC Emissions from Industrial Wastewater	Exempt	No affected VOC wastewater streams discharge to the sumps.	LAC 33:III.2153.B
wwT	GRP0014	wwT	LAC 33:III, Chapter 21, Subchapter M - Limiting VOC Emissions from Industrial Wastewater	Exempt	Any affected plant with an annual VOC loading in wastewater ≤ 10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B.	LAC 33:III.2153.G.1
C-555	EQT261	2,3	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY.	Vapor pressure is less than 1.5 psia	LAC 33:III.2103.A
C-351	EQT128	2,3	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	ЕХЕМРТ.	Mass annual emission is less than 500 lb/yr.	LAC 33:III.2149.A.2.b

### **TABLE 4: RECORDKEEPING**

Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
D-148	EQT010	Vanillin Solvent 1 Tank (MIBK)	≥1988	EQT009	101	9,120	yes
D-149	EQT011	Ethyl Vanillin Solvent 1 Tank (MIBK)	≥1988	EQT009	101	9,120	yes
D-152	EQT012	Solvent 2 Tank (MIBK)	≥1988	EQT009	101	15,400	yes
D-153	EQT013	Solvent 2 Tank (MIBK)	≥1988	EQT009	101	15,400	yes
D-169	EQT014	Solvent 3 Tank (Methanol)	≥1988	EQT009	101	11,200	yes
D-107	EQT016	Guaiacol Storage Tank	≥1988	EQT015	102	45,685	ves
D-111	EQT017	Guetol Storage Tank	≥1988	EQT015	102	31,725	ves
D-113	EQT018	Glyoxylic Acid Storage Tank	≥1988	EQT015	102	31,725	ves
C-202	EQT188	Premixing Reactor	≥1988	EQT019	103	,	yes
C-207	EQT189	Veratrole Stripper	≥1988	EQT019	103		ves
C-216	EQT020	Guaiacol Recycle Tank C-216	≥1988	EQT019	103	780	yes
C-217	EQT190	No. 1 Condensation Reactor	≥1988	EQT019	103		yes
C-219	EQT191	No. 2 Condensation Reactor	≥1988	EQT019	103	1,500	ves
C-221	EQT192	No. 3 Condensation Reactor	≥1988	EQT019	103	1,500	ves
C-223	EQT193	No. 4 Condensation Reactor	≥1988	EQT019	103	1,500	yes
C-225	EQT194	No. 5 Condensation Reactor	≥1988	EQT019	103	1,500	yes
C-227	EQT195	Polishing Reactor	≥1988	EQT019	103	· · · · · · · · · · · · · · · · · · ·	ves
C-236	EQT022	Neutralization Surge Tank	≥1988	EQT021	104	1,587	yes
C-240	EQT023	Extractor Tails Upset Tank	≥1988	EQT021	104	2,570	ves
C-241	EQT196	Guaiacol Extraction Column	≥1988	EQT021	104	····	yes
C-243	EQT024	Extraction 1 Tails Safety Decanter	≥1988	EQT021	104	900	yes
C-244	EQT025	Mandelate Surge Tank	≥1988	EQT021	104	2,570	yes
C-245	EQT197	Solvent 1 Washing Column	≥1988	EQT021	104	,	yes
C-247	EQT027	Solvent 1 Washing Safety Decanter	≥1988	EQT021	104	225	ves
C-249	EQT026	Solvent 1 Surge Tank	≥1988	EQT021	104	1,600	ves
C-301	EQT198	Guaiacol Recovery Column	≥1988	EQT021	104	· · · · · · · · · · · · · · · · · · ·	yes
C-306	EQT199	Guaiacol / Tars Separator	≥1988	EQT021	104		yes
C-312	EQT200	Solvent 1 Stripper Decanter	≥1988	EQT021	104		yes
C-314	EQT201	Solvent 1 Stripper	≥1988	EQT021	104		ves
C-316	EQT202	Solvent 1 Cold Trap (Vents through G-321X A/B and C-322X)	≥1988	EQT021	104		yes

### **TABLE 4: RECORDKEEPING**

Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
C-320	EQT203	Guaiacol Distillation Reflux Drum	≥1988	EQT021	104		yes
C-322X	EQT204	Solvent 1 Vacuum Package Separator	≥1988	EQT021	104		ves
H-317	EQT205	Vacuum System	≥1988	EQT021	104		yes
C-421	EQT032	Solvent 2 Surge Tank	≥1988	EQT031	106	1,785	yes
C-429	EQT208	CO2 Separator	≥1988	EQT031	106	· · · · · · · · · · · · · · · · · · ·	yes
C-430	EQT033	Solvent 2 Decanter	≥1988	EQT031	106	2,000	yes
C-432	EQT034	Extraction 2 Drain Tank	≥1988	EQT031	106	8,000	yes
C-434	EQT035	Extraction 2 Tails Safety Decanter	≥1988	EQT031	106	1,400	ves
C-435	EQT209	Vanillin Extraction Column	≥1988	EQT031	106	· · · · · · · · · · · · · · · · · · ·	yes
C-440	EQT210	Solvent 2 Washing Column	≥1988	EQT031	106		yes
C-441	EQT036	Aqueous Phase Surge Tank	≥1988	EQT031	106	4,100	yes
C-501	EQT037	Solvent 2 Distillation Surge Tank	≥1988	EQT031	106	8,095	yes
C-504	EQT211	Vanillin/Solvent 2 Atmospheric Distillation Column	≥1988	EQT031	106	-,	yes
C-507	EQT212	Vanillin/Solvent 2 Vacuum Distillation Column (Vents through E-510, C-516, G-532X and C-533X)	≥1988	EQT031	106		yes
C-516	EQT213	Solvent 2 Cold Trap (Vents through G-532X and C-533X)	≥1988	ÈQT031	106		yes
C-533X	EQT214	Solvent 2 Vacuum Package Separator	≥1988	EQT031	106		yes
C-558	EQT038	Aqueous Effluents Tank	≥1988	EQT031	106	2,700	yes
C-565	EQT215	Solvent 2 Recovery Column (Aqueous Phase Stripper, Vents through C-568 and E-569)	≥1988	EQT031	106		yes
C-568	EQT216	Solvent 2 Recovery Column (Top Rectification)	≥1988	EQT031	106		yes
C-575	EQT039	Solvent 2 Recovery Decanter	≥1988	EQT031	106	70	yes
E-428	EQT217	Condenser	≥1988	EQT031	106	- +	yes
H-520	EQT218	Vacuum System	≥1988	EQT031	106		yes
C-525	EQT219	Tars Removal Column (Vents through E-527, E-528, C-555A/B, Y-564X, G-561 and C-562X)	≥1988	EQT040	107		yes
C-529	EQT220	Tars By-Pass Tank	≥1988	EQT040	107		yes
C-535	EQT041	Tars Surge Tank	≥1988	EQT040	107	2,885	yes
C-545	EQT221	Lights Removal Column (Vents through E-547, E-548, C-555A/B, Y-564X, G-561 and C-562X)	≥1988	EQT040	107	2,000	yes

### **TABLE 4: RECORDKEEPING**

Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
C-555A/B	EQT222	Vanillin Cold Traps (Vents through Y-564X, G-561 and C-562X)	≥1988	EQT040	107		yes
C-562X	EQT223	Vanillin Purification Vacuum Package Separator	≥1988	EQT040	107	******	yes
C-616	EQT042	Flaker Surge Tank	≥1988	EQT040	107	3.870	yes
C-648	EQT043	Recycle Product Hopper Melter C-648	≥1988	EQT040	107	1,060	yes
C-655	EQT044	Melter Surge Tank	≥1988	EQT040	107	1,735	yes
H-556	EQT224	Vacuum System	≥1988	EQT040	107		yes
C-541	EQT046	Methanol Washing Drum (Vents through C-801)	≥1988	EQT045	108	600	yes
C-603	EQT048	Dissolver	≥1988	EQT045	108	2,300	yes
C-606	EQT049	Vacuum Crystallizer	≥1988	EQT045	108	3,710	ves
C-617	EQT050	Centrifuge Surge Tank	≥1988	EQT045	108	2,385	ves
C-634X	EQT225	Dryer Scrubber	≥1988	EQT045	108	<u> </u>	ves
C-637X	EQT226	Crystallization Vacuum Package Separator	≥1988	EQT045	108		yes
C-640	EQT227	Dryer (Vents through C-634X)	≥1988	EQT045	108		yes
C-801	EQT047	Solvent 3 Recovery Feed Tank	≥1988	EQT045	108	6,000	yes
C-805	EQT228	Solvent 3 Recovery Column	≥1988	EQT045	108		yes
H-619	EQT229	Vacuum System	≥1988	EQT045	108		yes
Y-620	EQT230	Centrifuge A	≥1988	EQT045	108		yes
Y-621	EQT231	Centrifuge B	≥1988	EQT045	108		yes
Y-640	EQT232	Dryer	≥1988	EQT045	108		yes
C-407	EQT206	Oxidation Reactor (Vents through D-417)	≥1988	NEW	111		ves
C-409	EQT029	Mandelate Surge Tank	≥1988	NEW	111	2,575	yes
C-416	EQT207	Oxidation Column (Vents through D-417)	≥1988	NEW	111		yes
D-417	EQT030	Oxidation Surge Tank	≥1988	NEW	111	22,000	yes
D-111	EQT053	Pyrocatechol Storage Tank	≥1988	EQT052	201	27,165	yes
D-128	EQT054	Tars Storage Tank	≥1988	EQT052	201	7,050	yes
D-141	EQT055	Veratrole Storage Tank	≥1988	EQT052	201	5,825	yes
C-201	EQT057	PC Dissolution Tank	≥1988	EQT056	202	4,750	yes
C-553	EQT058	Guaiacol Distillation Feed Tank	≥1988	EQT056	202	8,000	yes
C-561	EQT059	Recycle Process Water Tank	≥1988	EQT056	202	3,100	yes
C-603	EQT060	Guaiacol Distillation Kettle (Vents through C-606)	≥1988	EQT056	202	8,800	ves

### **TABLE 4: RECORDKEEPING**

Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
C-606	EQT233	Guaiacol Distillation Column (Vents through E-607, C-687A/B, G-682AX/BX, and C683X)	≥1988	EQT056	202		yes
C-615	EQT061	Tars Receiver	≥1988	EQT056	202	1,150	yes
C-645	EQT062	PMDB Receiver	≥1988	EQT056	202	2,500	ves
C-651	EQT063	PC Receiver	≥1988	EQT056	202	2,100	ves
C-655	EQT064	Guaiacol Lt. Ends Receiver	≥1988	EQT056	202	500	yes
C-660	EQT065	Intermediates/Veratrole Receiver	≥1988	EQT056	202	1,325	yes
C-665	EQT066	Second Receiver	≥1988	EQT056	202	750	yes
C-670	EQT067	End of Campaign Receiver	≥1988	EQT056	202	1,300	yes
C-675	EQT068	Guaiacol Receiver	≥1988	EQT056	202	5,227	yes
C-683X	EQT234	Guaiacol Vacuum Package Separator	≥1988	EQT056	202		ves
C-687A/B	EQT235	Guaiacol Distillation Cold Traps (Vents through G-682AX/BX, and C683X)	≥1988	EQT056	202		yes
C-701	EQT069	Crude Veratrole Wash Tank	≥1988	EQT056	202	1,550	ves
C-705	EQT070	Water Guaiacolate Receiver	≥1988	EQT056	202	1,325	yes
C-710	EQT071	Caustic Wash Receiver	≥1988	EQT056	202	897	yes
C-751	EQT072	Veratrole Distillation Kettle (Vents through C-754, E-760, C-787, G782AX/BX, and C-783X)	≥1988	EQT056	202	980	yes
C-754	EQT236	Veratrole Distillation Column (Vents through E-760, C-787, G782AX/BX, and C-783X)	≥1988	EQT056	202	450	yes
C-765	EQT073	Lt. Ends Receiver	≥1988	EQT056	202	110	ves
C-770	EQT074	Distilled Veratrole Receiver	≥1988	EQT056	202	800	yes
C-783X	EQT237	Veratrole Vacuum Separator	≥1988	EQT056	202		yes
C-787	EQT238	Veratrole Distillation Cold Traps (Vents through G782AX/BX, and C-783X)	≥1988	EQT056	202	THE STATE OF THE S	yes
C-213	EQT239	First Reactor	≥1989	EQT076	301		yes
C-215	EQT240	Second Reactor (vents indirectly via 1st reactor)	≥1989	EQT076	301		yes
C-217	EQT241	Third Reactor (vents indirectly via 1st reactor)	≥1989	EQT076	301		yes
C-219	EQT242	Fourth Reactor (vents indirectly via 1st reactor)	≥1989	EQT076	301		yes
C-223	EQT077	Phenol Drain Tank Reaction Surge Drum	≥1989	EQT076	301	765	yes
C-231	EQT243	Fifth Reactor (vents indirectly via 1st reactor)	2001	EQT076	301		yes

### **TABLE 4: RECORDKEEPING**

Point ID No.:		Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
C-416	EQT078	Predephenol Reflux Drum	≥1989	EQT076	301	2,937	yes
C-501	EQT244	Detarring Column, vents via H-524	≥1989	EQT076	301	2,001	ves
C-508	EQT079	Vertical Tar Diluter	≥1989	EQT076	301	264	yes
C-521	EQT245	Final Dephenoling Column, vents via H-524	≥1989	EQT076	301	204	yes
C-530	EQT080	Distillation Drain Tank	≥1989	EQT076	301	761	yes
C-532	EQT081	Tails Surge Drum	≥1989	EQT076	301	4,635	yes
E-418	EQT246	Phenol Condenser	≥1989	EQT076	301	1,000	yes
E-506	need	Detarring Condenser	≥1989	EQT076	301		yes
H-524	EQT247	Vacuum System	≥1989	EQT076	301	<100	yes
C-113	EQT083	Phenol Unloading Tank	≥1989	EQT082	302	1,000	yes
D-107	EQT084	Washwater Tank	≥1989	EQT082	302	88,900	yes
D-111	EQT085	Phenol Make-Up Tank	≥1989	EQT082	302	66,100	yes
D-115	EQT086	Washwater Tank	≥1989	EQT082	302	42,300	yes
D-204	EQT088	Recycle Phenol Tank	≥1989	EQT082	302	18,500	yes
D-315	EQT087	Raffinate Tank	≥1989	EQT082	302	58,000	yes
E-318	need	Predephenoling Vent Condenser	≥1989	EQT082	302	00,000	yes
C-301	EQT248	Water Stripper, vents via E-401	≥1989	EQT089	303		yes
C-308	EQT091	IPE Settler	≥1989	EQT089	303	6,780	yes
C-311	EQT092	Wash Water Drum	≥1989	EQT089	303	6,822	yes
C-313	EQT249	Extraction Column, vents via E-401	≥1989	EQT089	303	0,022	yes
C-320	EQT090	IPE Storage Tank	≥1989	EQT089	303	23,978	yes
C-322	EQT093	Ether Drain Tank	≥1989	EQT089	303	673	yes
C-405	EQT250	Dehydration Column, vents via E-408 and E-401	≥1989	EQT089	303	010	yes
E-401	EQT251	Solvent Vent Condenser	≥1989	EQT089	303		yes
C-536	EQT252	Splitter Column (PC/HQ Separation), vents via H-545	≥1989	EQT094	304		yes
C-551		PC Receiving Drum	≥1989	EQT094	304	500	·
C-563	***************************************	PC Flaker Feed Tank	≥1989	EQT094	304	500	yes
H-545	EQT253	Vacuum System	≥1989	EQT094	304	500	yes
S-560		PC Flaker (Intermittent, for S/D only)	≥1989	EQT094	304		yes
C-650	EQT098	Reflux Surge Drum C-650	≥1989	EQT094	306	350	yes yes

### **TABLE 4: RECORDKEEPING**

Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
D-607	EQT099	HQ Dissolver Tank D-607	≥1989	EQT097	306	1.375	yes
D-610	EQT100	HQ Surge Tank D-610	≥1989	EQT097	306	7,000	ves
D-612	EQT101	Carbon Treater Tank D-612	≥1989	EQT097	306	700	ves
D-632	EQT102	Crystallization Tank D-632	≥1989	EQT097	306	1,763	ves
D-652	EQT103	Mother Liquor Surge Tank D-652	≥1989	EQT097	306	8,068	ves
D-653	EQT104	Conc. Column Feed Tank D-653	≥1989	EQT097	306	6,792	yes
D-657	EQT105	Mother Liquor Surge Drum D-657	≥1989	EQT097	306	85	yes
D-681	EQT137	Screener Residue Dissolver	≥1989	EQT097	306	212	* <del> </del>
H-640	EQT256	Vacuum System for Crystallizers	≥1989	EQT097	306	212	yes
D-197	EQT120	Tank D-197	≥1988	GRP0014	WWT	50,000	yes no
D-210	EQT121	West Aeration Basin	≥1988	GRP0014	WWT	1,530,000	no
D-213	EQT122	East Aeration Basin	≥1988	GRP0014	WWT	1,530,000	no
D-280	EQT118	Tank 28	≥1988	GRP0014	WWT	600,000	no
D-290	EQT119	Tank 29	≥1988	GRP0014	WWT	1,500,000	no
D-301	EQT123	West Clarifier	≥1988	GRP0014	WWT	296,200	no
D-304	EQT124	East Clarifier	≥1988	GRP0014	WWT	296,200	no
C-101	EQT127	IPE Solvent Storage Tank	≥1988	GRP002*	2, 3	8,840	yes
C-132	EQT133	MeCl Storage Tank	≥1988	GRP002*	2, 3	14,340	ves
C-136	EQT134	EtCl Storage Tank	≥1988	GRP002*	2, 3	15,400	ves
C-251	EQT255	Batch Reactor	≥1988	GRP002*	2, 3	10,400	yes
C-301	EQT135	Acidification/Decantation Tank	≥1988	GRP002*	2, 3	8,000	ves
C-351	EQT128	RAG Layer Diverting Tank	≥1988	GRP002*	2, 3	3,430	yes
C-352	EQT130	RAG Layer Surge Tank	≥1988	GRP002*	2, 3	1,500	ves
C-401	EQT129	Aqueous Phase Surge Tank	≥1988	GRP002*	2, 3	6,162	yes
C-451	EQT257	Extraction Column	≥1988	GRP002*	2, 3	0,102	yes
C-461	EQT131	Aqueous Effluents Tank	≥1988	GRP002*	2, 3	715	yes
C-501	EQT258	Deetheration Column (Vents through C-503)	≥1988	GRP002*	2, 3		yes
C-503	EQT136	Deetheration IPE Decanter	≥1988	GRP002*	2, 3	208	yes
C-511	EQT259	Deetheration Gualacol Decanter (Vents through C-501)	≥1988	GRP002*	2, 3		yes
C-521	EQT132	Organic Phase Surge Tank	≥1988	GRP002*	2, 3	7,070	yes

### **TABLE 4: RECORDKEEPING**

Emission Point ID No.:	TEMPO ID	Description	Construction Date	Routes to: (TEMPO)	Routes to: (EPN)	Operating Rate/ Volume (gallons)	Applicable Requirements?
C-551	EQT260	Crude Guaiacol Dehydration Column (Vents through C-501)	≥1988	GRP002*	2, 3		yes
C-555		Wet Guaiacol Tank (Vents through C-501)	≥1988	GRP002*	2, 3	425	yes

### **SECTION 5.0**

# EMISSION INVENTORY QUESTIONNAIRE FOR AIR POLLUTANTS

							State of	Louisiana	1					Date of Sul	omittal	
					<b>Emissions</b>	Inventory	Questio	nnaire (E	IQ) for Aiı	r Pol	lutants			February	2010	
Eı	nission Point ID (Alternate ID			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. Na	ıme)			Approximate Location	on of Stack or	Vent (see ir	nstructions)		
	101	<b>,</b>							Metho	_	N/A		Datum	NA	D 83	
~~~		/D.11		Lic	ht Tank Farm	Scrubbei	r C-165		UTM 2	-		73,667 mE	- Vertical			
I IEM	PO Subject Iten				,				Latitud Longit	-		0 min 41 1 min 24		hundredths		
	EQT0009								Longi	.uue	91 degrees 1	<u> </u>	_secb	hundredths	5	
F	nd Discharge Physical racteristics	Diameter Stack Disch Area	harge H	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Stat	k Gas Exit	Normal Operating 1 (hours per y	Time	Date of Construction or Modification	Percen Jan - Mar		Throughput ssion Point Jul - Sep	through Oct - Dec	
С	hange?	0.25	1	70 ft	7.50 ft/sec	22.1	ft³/min	86 °F	8760	<b>´</b>	After 1988	25%	25%	25%	25%	
	No ft <sup>2</sup> 70 ft 7.30 fts  Type of Fuel Used and Heat Input (see instructions)					22.1								25%	20%	
Fuel	Type of Fue		Heat In	put (see instruct) Heat Input (							Parameters (inlude /Parameter	units)	Donorini	Description		
a	N N		<del>-  </del> -	rieat inpat (	iviivi Dia/iii)	Normal Op	erating Rate	/Throughpu		NA	rraiametei		Descrip	1011		
b								ate/Through								
С						Design Car		ne								
			Notes			Shell Heigh	ell Height (ft)  nk Diameter (ft)									
						I ank Diam	eter (It)	LDoof O	Floating Roo		External Floatii	D(		- C D f		
E.	nission Point ID	) No				Air Dol				ΟI	C External Floatii	ng Root U	Internal Fig	ating Root		
	(Alternate ID			<u> </u>			sed Emissio	ecific Info								
		· · · · · · · · · · · · · · · · · · ·		ntrol Control	HAP/TAP CAS					Permitted	,	Continuous	Concentra	tion in Gase	s Exiting at	
	101 Pollutant		Equipm	pment Equipment HAP	Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	Emission F (tons/yr		Delete, or 0 Unchanged	Compliance Method		Stack	,	
	PM <sub>10</sub>			·												
	SO₂													<del></del>		
	NOx															
	CO		201													
N.A.	VOC Total ethyl isobutyl ke	otono	001 001		NA 108-10-1	0.04	NA NA	0.16	0.17		C C					
IVI	Methanol	CIONE	001		67-56-1	0.04	NA NA	0.16 <0.01	0.17 0.002		c		<u> </u>			
				00.070	0, 00 1	0.001	10.	10.01	0.002							
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					Emissions	Inventory	Questio	nnaire (E	IQ) for Air Po	llutants			February	2010	
Ei	mission Point II (Alternate ID			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. Na	me)		Approximate Loca	tion of Stack or	Vent (see i	nstructions)	***************************************	
	102								Method	N/A		Datum		D 83	
TEM	PO Subject Iter	n ID No		Hea	vies Tank Far	m Scrubb	er C-187		UTM Zone Latitude		673,652 mE 30 min 39		Vertical 3,376,805 mN 9 hundredths		
'=	EQT0015								Longitude		11 min 25				
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	and Discharge Physical	Diameter Stack Discl		Height of Stack   Stack Exit   at Conditions   Stack Gas Exit   Operations		Normal Operating Time	Date of Constructi	uction   Th		nnual Throughput through is Emission Point					
	racteristics	Area	-	Above Grade	Velocity	not at Star	′	mperature	(hours per year)	or Modification	Jan - Mar	Apr - Jun		Oct - Dec	
C	Change?	0.67		8 ft	7.50 ft/sec	159	ft³/min	86 °F	8760	After 1988	25%	25%	25%	25%	
	No ft² 7.50 W														
Fuel		of Fuel	- rical ii		(MM Btu/hr)					g Parameters (inlude/Parameter	c unitoj	Descrip	tion		
а	N	IA		·				/Throughpu	t NA			•			
b c						<b>?</b>	Operating Roacity/Volun	ate/Through	put						
<u> </u>			Notes		·	Shell Heigh									
		······································				Tank Diam	eter (ft)								
							O Fixed		Floating Roof	O External Floa	ting Roof O	Internal Fig	oating Roof		
E	mission Point II (Alternate ID				1			ecific Info	mation			1			
	`	′)	Control Control		HAP/TAP CAS				Permitted	Add, Change,	Continuous		ncentration in Gases Exitin		
	102		Equipme	Equipment Equipme	Equipment Equipment	uipment   Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	Emission Rate (tons/yr)	Delete, or Unchanged	Compliance Method		Stack	
	Pollutant PM <sub>10</sub>					(12/11/)	(15/1117)	(10,10,7,1)	(10.10.3.)	orionarigos	111011104				
***************************************	SO <sub>2</sub>														
	NOx												,		
	CO		00/	4 505		0.004	310	0.04	0.04	11					
	VOC Total		001	1 >95		0.001	NA	0.01	0.01	U					
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					Emissions	nventory	Questio	nnaire (E	IQ) fo	or Air Pol	llutants				February 2	2010	
	Emission Point IC		····	Descriptive	Name of the En	nissions Sou	rce (Alt. Na	me)			Approximate Loc	ation of	Stack or \	Vent (see in	structions)		
	(Alternate ID	)				•				Method	N/			Datum		83	
	103			^	andanastian (	Parishbar (	201		İ	UTM Zone	15 Horizontal		63 mE	Vertical			
TE	EMPO Subject Iter	n ID No.		C	ondensation S	scrupper (	J-20 I			Latitude	30 degrees		nin <u>41</u>		hundredths		
	EQT0019									Longitude	91 degrees	<u>11</u> m	nin <u>24</u>	sec /	hundredths		
Stac	k and Discharge	Diameter		eight of Stack	Stack Exit	Stack Gas	I Star	k Gas Exit		Vormal	Date of Construc	ction Percent of A				hrough	
؍ ا	Physical Characteristics	Stack Disch Area	19776 I	Above Grade	Velocity	at Condition	ons, Tai	nperature	•	rating Time rs per year)	or Modification	n	Jan - Mar	This Emis	sion Point Jul - Sep	Oct - Dec	
'	Change?	0.25	ft						(HOGI		46 4000	-					
	No		ft²	88 ft	5.4 ft/sec	15.9	ft³/min	86 °F		8760	After 1988		25%	25%	25%	25%	
			Heat Inp	ut (see instructi		Operating Parameters (inlude units)							s)				
Fuel		of Fuel		Heat Input (	MM Btu/hr)	Name of Occasion Pate/Throughout				Value NA	e/Parameter			Descript	ion		
a b	N	iA				Normal Operating Rate/Throughput  Maximum Operating Rate/Throughput				I NA							
C								Design Capacity/Volume									
	L :		Shell Heigh														
			Tank Diam	` '													
							O Fixed	Roof O	Floati	ing Roof	O External Flo	oating R	toof O	Internal Flo	ating Roof		
	Emission Point II	O No.				Air Pol	lutant Sp	ecific Infor	mati	on							
	(Alternate ID	))	Control	[ Control		Propos	ed Emissio	d Emission Rates		Permitted	Add, Change,	Continuous			Concentration in Gases Exitin		
	103		Equipme Code		HAP/TAP CAS Number	Average	Maximum	Annual	Emi	ssion Rate tons/yr)	Delete, or Unchanged	Com	pliance ethod	Concentra	tion in Gase Stack	s Exiting at	
	Pollutant		Code	Linciency		(lb/hr)	(lb/hr)	(tons/yr)	,	toris/yr)	Officialiged	IVIC	31110U				
	PM <sub>10</sub>				war v												
	SO <sub>2</sub>						****										
<u> </u>	NOx CO																
┢	VOC Total		001	>95		0.01	0.02	0.05		0.05	U						
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					<b>Emissions</b>	Inventory	Questio	nnaire (E	IQ) for Air Po	llutants			February	2010
Er	nission Point II (Alternate ID			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. Na	ıme)		Approximate Loca	ition of Stack or	Vent (see in	nstructions)	
	104	•							Method UTM Zone	N/A 15 Horizontal		Datum Vertical		D 83
TEM	PO Subject Iter			S	olvent 1 Vent	Scrubber	C-248		Latitude	30 degrees		sec 10	hundredths	<del></del>
· Stack a	EQT0021 nd Discharge	Diamete	ror ,	Intable of Occupie	Ote als Fait	Stack Gas	Flow		Normal		Porcon	it of Annual	•	
	hysical racteristics	Stack Discl Area	narge	Height of Stack Above Grade	Stack Exit Velocity	at Conditi not at Star	ons,   Ta	k Gas Exit mperature	Operating Time (hours per year)	Date of Constructi or Modification	Jan - Mar	This Emis	sion Point	Oct - Dec
С	hange? No	0.25	ft ft²	70 ft	5.5 ft/sec	16.2	ft³/min	86 °F	8760	After 1988	25%	25%	25%	25%
			Heat In	put (see instruct			•		Operatin	g Parameters (inlud	e units)	•	£	
Fuel		of Fuel		Heat Input (	MM Btu/hr)		., -			/Parameter		Descript	tion	
a b c	1	<b>I</b> A					Operating R	e/Throughpu ate/Through ne						
			Notes			Shell Heigh								
						Tank Diam			1					
							O Fixed		Floating Roof	O External Floa	iting Roof O	Internal Flo	ating Roof	
Er	nission Point II							ecific Info	mation					·····
	(Alternate ID	))	Contro	ol Control	HAP/TAP CAS	Propos	ed Emissio	n Rates	Permitted	Add, Change,	Continuous	Conceptra	tion in Gase	o Evitina o
	104 Pollutant		Equipm Code		Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	Emission Rate (tons/yr)	Delete, or Unchanged	Compliance Method	Concentia	Stack	ss Exiting a
	PM <sub>10</sub>													
	SO₂				***************************************	1								
	NOx													
	co													
B.A.	VOC Total		001 001		400 40 4	0.03	0.03	0.12	0.12	U				
IVI	ethyl isobutyl k	есопе	001	98.7%	108-10-1	0.03	0.03	0.12	0.12	U				
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						Emissions				IQ) f	or Air Pol	llutants				February 2	2010
	En	nission Point ID (Alternate ID)			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. Na	ime)			Approximate Loc	ation	of Stack or \	Vent (see in	structions)	
		105									Method UTM Zone	N/ 15 Horizontal	Ά	mE	Datum	NAI	O 83
Т	EME	O Subject Iten	ı ID No.			Oxidation Sc	rubber C-	419			Latitude	degrees			Vertical sec	hundredths	mN
•		EQT0028									Longitude	degrees			sec	hundredths	
Sta		nd Discharge hysical	Diameter Stack Disch		ght of Stack	Stack Exit	Stack Gas	1 510	ck Gas Exit		Normal rating Time	Date of Construc	ction	Percent		Throughput t	through
		acteristics	Area	'aige Ab	ove Grade	Velocity	not at Stan	····/ I Ta	mperature		rs per year)	or Modificatio	n	Jan - Mar		Jul - Sep	Oct - Dec
		hange? No		ft ft²	ft	ft/sec		ft³/min	°F		, , , , , , , , , , , ,						
			el Used and		t (see instruc	tions)					Operating	ı g Parameters (inlu	ıde ur	ll nits)			
Fuel	П	Туре с				(MM Btu/hr)			,			/Parameter			Descript	ion	
а		N,	Ą					_	e/Throughpu		NA						
b									ate/Through	put							
С				Notes			Design Cap Shell Heigh		ne								
				NOIGS			Tank Diam										
							Tallit Brain		Roof O	Floati	ina Roof	O External Fig	oating	Roof ()	Internal Flo	ating Roof	
	Ε'n	nission Point IE	No.			:	Air Pol		ecific Infor					<u> </u>			
		(Alternate ID)	)					ed Emissic				A 44 Ob		4!			
		105		Control Equipment	Control Equipment	HAP/TAP CAS	Average	Maximum	Annual		ermitted ssion Rate	Add, Change, Delete, or		ontinuous mpliance	Concentra	tion in Gase	s Exiting at
		Pollutant		Code	Efficiency	Number	(lb/hr)	(lb/hr)	(tons/yr)	(1	tons/yr)	Unchanged		Viethod		Stack	
	}	PM <sub>10</sub>							<u> </u>								
		SO <sub>2</sub>									*				***************************************		
		NOx															
		CO							<u> </u>		^ ^^						
	NA	VOC Total ethyl isobutyl ke	tono								0.08 0.002	D D					
_	IVIC	Methanol	SIONE								0.002	D					
		Motificial									0.01						
								<del></del>	<b>†</b>								
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<u> </u>									1				<u> </u>		*********		
								<del> </del>	1				$\vdash$				
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							State of	Louisiana	3						Date of Sub	mittal
					<b>Emissions</b>	Inventory	Questio	nnaire (E	IQ) f	or Air Po	llutants				February	2010
	Emission Point II (Alternate ID			Descriptiv	e Name of the Er	nissions Sou	ırce (Alt. Na	ime)			Approximate Loc	cation	of Stack or	Vent (see ir	nstructions)	
	106									Method UTM Zone		/A 673	,661 mE	. Datum Vertical	***************************************	D 83 72 mN
П	EMPO Subject Itel			Va	nillin Extractio	n Scrubbe	er C-427			Latitude	30 degrees	30	min 42 min 24	sec 0	hundredths	
	ck and Discharge Physical Characteristics	Diamete Stack Disc Area	harge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Stat	ck Gas Exit	Oper	Normal rating Time rs per year)	Date of Construction		Percent Jan - Mar	This Emis	Throughput ssion Point Jul - Sep	through Oct - Dec
	Change? No	0.25	ft²	70 ft	30.4 ft/sec	90	ft³/min	86 °F		8760	After 1988		25%	25%	25%	25%
	Y		Heat I	nput (see instruct						Operatin	g Parameters (inlu	ıde un	its)			
Fuel		of Fuel		Heat Input (	(MM Btu/hr)						/Parameter			Descript	tion	
a b c		IA				Maximum ( Design Car	Operating Roacity/Volun	e/Throughpu ate/Through ne		NA						
			Notes			Shell Heigh										1
-						Tank Diam										
						i	O Fixed			ng Roof	O External Flo	pating	Roof ()	Internal Flo	pating Roof	
	Emission Point II							ecific Info	rmati	on						
	(Alternate ID	<b>'</b> )	Cont Equipn	nent Equipment	HAP/TAP CAS Number	Average	ed Emissio Maximum	Annual	Emi	ermitted ssion Rate	Add, Change, Delete, or	Co	ntinuous mpliance	Concentra	tion in Gase Stack	s Exiting at
	Pollutant		Cod	e Efficiency		(lb/hr)	(lb/hr)	(tons/yr)	(1	tons/yr)	Unchanged	1	Method		010011	
<b>└</b>	PM <sub>10</sub>															
<b>⊢</b>	SO₂					<u> </u>										
$\vdash$	NOx CO						***************************************		<del>                                     </del>							
$\vdash$	VOC Total		00.	1 98.0%		0.21	0.82	0.90	_	1.9	С					
	Methyl isobutyl k	etone	00		108-10-1	0.21	0.82	0.90		1.9	C					
							***************************************						***************************************			
<u> </u>																
$\vdash$						<del> </del>	<u></u>									
							<u> </u>									
												,-,-,-,-,-,-,-,-,-,-,-,-,-,-,-,-,-,-,-,-				

		Approximate Location of Stack or V													Date of Sub	omittal
		ssion Point ID No Descriptive Name of the Emissions Source (Alt. Name)													February	2010
E				Descriptiv	e Name of the En	nissions Sou	ırce (Alt. N	ame)			Approximate Loc	cation	of Stack or	Vent (see i	nstructions)	
	107				D:	0	-			Method UTM Zone		/A 673	,658 mE	Datum Vertica		D 83 69 mN
TEM	IPO Subject Iter EQT0040				Distillation Sc	crupper C-	557			Latitude Longitude	30 degrees	30		sec 9	hundredths hundredths	3
Cha	and Discharge Physical aracteristics	Diameter Stack Discl Area	harge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi- not at Star	ons, Sta	ick Gas Exit emperature	Oper	Normal rating Time rs per year)	Date of Construction or Modification		Percen Jan - Mar	This Emi	Throughput ssion Point Jul - Sep	through Oct - Dec
	Change? No	0.33	ft²	70 ft	1.6 ft/sec	8.2	ft³/min	86 °F		8760	After 1988		25%	25%	25%	25%
	Type of Fue	el Used and	Heat I	nput (see instruct	tions)					Operatin	g Parameters (inlu	ude ur	nits)	· · · · · · · · · · · · · · · · · · ·	***************************************	
Fuel	Туре с			Heat Input (							/Parameter			Descrip	tion	
a b c	N	A 	:			Maximum ( Design Car	Operating Foodity/Volu	e/Throughpu Rate/Through me		NA						
<u> </u>			Notes			Shell Heigh	, -									
						Tank Diam	<del></del>	<u> </u>		<u></u>		<u> </u>	<del></del>			
<u> </u>	: :-:	\	_			A: F3 - I	O Fixe			ing Roof	O External Flo	oating	ROOT U	Internal Fi	pating Roof	
	mission Point IE (Alternate ID						ed Emissi	ecific Info	matic	on				1		
	107	,	Cont Equipr Cod	nent Equipment	HAP/TAP CAS Number	Average	Maximum	n Annual	Emis	ermitted ssion Rate	Add, Change, Delete, or	Co	ontinuous empliance	Concentra	ation in Gase Stack	es Exiting at
	Pollutant		C00	le Eniciency		(lb/hr)	(lb/hr)	(tons/yr)	(1	tons/yr)	Unchanged	ľ	Method			
	PM <sub>10</sub>															
	SO <sub>2</sub>															
	NOx CO				***************************************											
	VOC Total		00	1 >95		<0.001	0.10	0.01	<u> </u>	0.001	С					
N	lethyl isobutyl k	etone	00		108-10-1	<0.001	0.10	0.01		0.001	Č					
										-						
									<u> </u>							
L	<u> </u>		<u></u>			l	<u> </u>					<u> </u>		1		

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							***	State of	Louisiana	1						Date of Sub	mittal
L						<b>Emissions</b>	Inventory	<b>Questi</b>	onnaire (E	IQ) f	or Air Po	llutants				February:	2010
	En	nission Point II (Alternate ID			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. N	lame)			Approximate Loc	cation	of Stack or	Vent (see ir	nstructions)	
		108								1	Method	N,			Datum		D 83
$\vdash$	TEM	O Subject Iter	n ID No.		C	Crystallization	Scrubber	C-624			UTM Zone Latitude	15 Horizontal 30 degrees		,646 mE min 42	Vertical	3,376,8 hundredths	
		EQT0045												min 25		hundredths	
s	Р	nd Discharge hysical acteristics	Diamete Stack Disc Area	harge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Sta	ack Gas Exit emperature	Oper	Normal rating Time rs per year)	Date of Construction		Percent Jan - Mar		Throughput ssion Point Jul - Sep	through
	- 1	hange? No	0.25	ft ft²	88 ft	5.60 ft/sec		ft³/min	86 °F		8760	After 1988		25%	25%	25%	25%
			el Used and		I nput (see instruct	tions)				L	Operatin	l g Parameters (inlu	ıde un	its\		<u> </u>	<u> </u>
Fu	el	Туре	of Fuel		Heat Input (							Parameter			Descript	tion	
	a   o   c	N	A 					Operating I	te/Throughpu Rate/Through me		NA						
$\vdash$				Notes			Shell Heigh										
							Tank Diam		ed Roof		D	<u> </u>		<del></del>			
-	Fr	nission Point II	) No	I			Air Dol		pecific Infor		ing Roof	O External Flo	pating	Roof O	Internal Flo	ating Roof	
		(Alternate ID						ed Emissi		ľ							
		108		Cont Equipn Cod	ment Equipment	HAP/TAP CAS Number	Average	Maximun	Annual	Emis	ermitted ssion Rate	Add, Change, Delete, or	Cor	ntinuous mpliance	Concentra	tion in Gase Stack	s Exiting at
		Pollutant		000	Ellicioney		(lb/hr)	(lb/hr)	(tons/yr)	(t	tons/yr)	Unchanged	IX	Method			
H		PM <sub>10</sub> SO <sub>2</sub>														M-A-	
$\vdash$		NOx															
$\vdash$		CO															·····
		VOC Total		00			0.002	0.002	0.01		0.01	U					
<u> </u>		Methanol		00.	1 99.9%	67-56-1	0.002	0.002	0.01		0.01	U					
-														•••			
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$\vdash$				<u> </u>					+	-				·			
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$\vdash$				<del>                                     </del>					-								
$\vdash$									<b>-</b>								
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							State of	Louisian	1					Date of Sul	omittal
					<b>Emissions</b>				IQ) for Air I	Pollutants				February	2010
Er	mission Point II (Alternate ID			Descripti	ve Name of the Er	nissions So	urce (Alt. N	lame)		Approximate Lo	cation	of Stack or	Vent (see in	nstructions)	
	109			_					Method UTM Zo		I/A	656 mF	_ Datum Vertical		D 83
TEMI	PO Subject Iter EQT0051			E	aghouse Filter	/Scrubbei	r C-704		Latitude		30	min 42 min 24	sec 6	hundredths hundredths	S
P Chai	nd Discharge hysical racteristics hange?	Diameter Stack Discl Area	harge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ions, Sta	ack Gas Exit emperature	Normal Operating Tin (hours per ye			Percent Jan - Mar		ssion Point	
	No	1.5	ft²	88 ft	75 ft/sec	7,952	ft³/min	75 °F	8760	After 1988		25%	25%	25%	25%
			Heat I	nput (see instru					Opera	ating Parameters (inl	ude un	its)			
Fuel		of Fuel		Heat Input	(MM Btu/hr)					alue/Parameter			Descrip	tion	
a b c	N	Α				Maximum ( Design Ca	Operating pacity/Volu	te/Throughpu Rate/Through ime		NA .					
			Notes			Shell Heigh	nt (ft)								
						Tank Diam	eter (ft)				].				
							O Fixe	ed Roof O	Floating Roof	External FI	loating	Roof O	Internal Flo	ating Roof	
Er	nission Point II					Air Po	llutant S <sub>l</sub>	pecific Info	mation						
	(Alternate ID	)	Cont Equipa		HAP/TAP CAS	Propos Average	sed Emissi Maximun		Permitted Emission Rai	Add, Change, te Delete, or		ntinuous mpliance	Concentra		es Exiting at
	Pollutant		Cod		Number	(lb/hr)	(lb/hr)	(tons/yr)	(tons/yr)	Unchanged		/lethod		Stack	
	PM <sub>10</sub>		01	7 95%		0.02	0.03	0.07	0.09	С					
	SO <sub>2</sub>														
	NOx		*******		***************************************	**********								h-h-h-	
	CO														
<u> </u>	VOC Total				,						<u> </u>				
					-			-							
				<u> </u>							<u> </u>	-			
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								State of	Louisiana	<u> </u>						Date of Sub	omittal
						<b>Emissions</b>	Inventory	/ Questi	onnaire (E	IQ) f	or Air Po	llutants				February	2010
	En	nission Point ID (Alternate ID			Descriptiv	e Name of the En	nissions Sou	urce (Alt. N	ame)			Approximate Loca	ation of S	Stack or	Vent (see ir	nstructions)	
		110	,								Method UTM Zone	N/A 15 Horizontal		1	Datum		D 83
٦	ГЕМГ	O Subject Iten				High Purity PC	Mixing V	'essel			Latitude	30 degrees	30 mir 11 mir	1 42		hundredths	3
		EQT0139									Longitude			1		hundredths	<b>.</b>
	P	nd Discharge hysical acteristics	Diameter Stack Disch Area	harge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Sta	ck Gas Exit emperature	Oper	Normal rating Time rs per year)	Date of Construct or Modification		Percen		Throughput ssion Point Jul - Sep	through Oct - Dec
	Cl	hange? No	0.08	ft ft²	32 ft	61 ft/sec	20	ft³/min	120 °F		8760	2004		25%	25%	25%	25%
		Type of Fue	el Used and	Heat I	nput (see instruct	tions)			w		Operatin	g Parameters (inlud	de units)		<u> </u>		<u>.                                    </u>
Fue	4	Type o			Heat Input (	(MM Btu/hr)						e/Parameter			Descript	tion	
a b c		N	А				Maximum ( Design Car	Operating Foodity/Volu	e/Throughpu Rate/Through me		NA						
				Notes			Shell Heigh										
							Tank Diam			-							
		nission Point ID	N N I -	r			41 5	O Fixe			ng Roof	External Floa	ating Ro	of O	Internal Flo	pating Roof	
	En	alssion Point IL (Alternate ID)				www.			ecific Info	matic	on						·····
			,	Cont		HAP/TAP CAS	Propos	sed Emissio	on Rates	Pe	ermitted	Add, Change,	Contin	nuous	Canaantra	tion in Coos	s Exiting at
		110 Pollutant		Equipn Cod		Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	ŧ	ssion Rate tons/yr)	Delete, or Unchanged	Compl Meth		Concentra	Stack	s ⊏xiiing ai
		PM <sub>10</sub>								<del>                                     </del>							
		SO <sub>2</sub>							<u> </u>				··········				
		NOx															
		co													1.1		
	İ	VOC Total	1	001	0		0.05	0.06	0.01		0.01	Ü					••••
		Pyrocatecho	1							· '	<0.001	D					
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						;	State o	f Louisiana	)						Date of Sub	mittal
Į					<b>Emissions</b>	Inventory	Questi	ionnaire (E	IQ) f	or Air Pol	llutants				Feb 2010 - p	relim*
Er	nission Point ID (Alternate ID)			Descriptiv	re Name of the En	nissions Sou	ırce (Alt. I	Name)			Approximate Loca	ation	of Stack or	Vent (see in	structions)	,,-,,
	111									Method UTM Zone	N/A 15 Horizontal		.672 mF	Datum Vertical	NAI 3,376,8	0 83 85 mN
l	PO Subject Iten  ONE ASSIG				Oxidati	on Vent				Latitude	30 degrees	30	min 42 min 24	sec 4	hundredths hundredths	
F	nd Discharge hysical racteristics	Diameter Stack Disch Area	narge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Condition not at Stan	ons, St	tack Gas Exit Femperature	Ope	Normal rating Time rs per year)	Date of Construct or Modification		Percent Jan - Mar	of Annual T This Emis Apr - Jun	sion Point	
	hange?	0.83		70 ft	29.8 ft/sec		ft³/min	86 °F	(110u	8760	2010		25%	25%	25%	25%
		el Used and		Input (see instruc	tions)		<u> </u>			Operatin	g Parameters (inlud	de un	its)			
Fuel	Type o				(MM Btu/hr)						/Parameter			Descript	ion	
a b c	N.	A					Operating	ate/Throughpu Rate/Through ume		NA				·		
			Notes			Shell Heigh Tank Diame	eter (ft)									
						<u> </u>				ing Roof	O External Floa	ating	Roof ()	Internal Flo	ating Roof	
Er	mission Point ID							pecific Infor	mati	on						
	(Alternate ID	)	Con	trol Control		Propos	ed Emiss	sion Rates	D	ermitted	Add, Change,	Co	ntinuous			
	111	·····	Equip: Cor	ment Equipment	HAP/TAP CAS Number	Average (lb/hr)	Maximui (lb/hr)	I	Emi	ssion Rate tons/yr)	Delete, or Unchanged	Co	mpliance Method	Concentral	tion in Gase Stack	s Exiting at
<u> </u>	Pollutant					(1071117	(1317117)	(10,10,7)	<u>`</u>		g	•				
	PM <sub>10</sub>												***************************************			
	SO₂ NOx															
	CO					<del></del>		+								
	VOC Total		00	00		0.02	0.02	0.08	<b></b>		Α	-				
М	ethyl isobutyl ke	etone	00		108-10-1	<0.001	<0.001				A					
	Methanol		00	00	67-56-1	0.001	0.001	0.01			Α					
																·····
		•														
L		uill be fine!!-	rod of	or stock tost whis	h is scheduled for	Lata Eab 00	10							l		

<sup>\*</sup>Data are preliminary, will be finalized after stack test which is scheduled for late Feb 2010.

								State of	Louisiana	ı						Date of Sub	omittal
						<b>Emissions</b>	Inventory	Questi	onnaire (E	IQ) fo	or Air Pol	lutants				February	2010
		n Point ID ernate ID)			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. N	lame)			Approximate Loc	ation	of Stack or	Vent (see	instructions)	
		201									Method	N/			Datu		D 83
770 F	İ		JB N			Tank Farm So	rubber C	-146				15 Horizontal		,598 mE	Vertic		
115		ubject Item									Latitude Longitude	30 degrees 91 degrees		min 39 min 27		hundredths hundredths	
	EG	QT0052									Longitude	degrees		11011	. 560		•
	k and Dis Physica haracteri	al .	Diameter Stack Disch Area	arge Hei	ght of Stack love Grade	Stack Exit Velocity	Stack Gas at Condition not at Star	ons, St	ack Gas Exit emperature	Opera	lormal ating Time	Date of Construction			This En	Throughput	
	Change No	1	0.25	ft ft²	30 ft	5.4 ft/sec			Ambient °F		s per year) 8760	After 1988		Jan - Mar 25%	Apr - Ju 25%	25%	Oct - Dec 25%
		vpe of Fue	I Used and	* *	t (see instruc	tions)				<u> </u>	Operatin	g Parameters (inlu	de un	its)			<u> </u>
Fuel		Туре о			Heat Input	(MM Btu/hr)						/Parameter		/	Descr	ption	
а		N/	Ą						te/Throughpu		NA						
b								-	Rate/Through	put							
С				Notes			Design Car Shell Heigh		ıme								
				NOICS			Tank Diam										
								. ,	ed Roof	Floati	ng Roof	O External Flo	ating	Roof O	Internal F	loating Roof	
	Emission	n Point ID	No.				Air Pol		pecific Infor		<del>-</del>		<u>~</u>	***************************************	<del></del>		
	(Alte	ternate ID)	)	<b>a</b> ( )				ed Emiss		Y	ermitted	Add, Change,		ntinuous			
		201		Control Equipment	Control Equipment	HAP/TAP CAS	Average	Maximur	n Annual		sion Rate	Delete, or		mpliance	Concent	ration in Gase	es Exiting at
		Pollutant		Code	Efficiency	Number	(lb/hr)	(lb/hr)	(tons/yr)		ons/yr)	Unchanged		<b>Nethod</b>	ĺ	Stack	
		PM <sub>10</sub>			+			<u> </u>	+						-		
		SO <sub>2</sub>			<del> </del>		······································		+								
		NOx															
		CO		******													
		OC Total		001	>95		0.01	NA	0.03		0.04	С					
<u> </u>		droquinone	9						<u> </u>		<0.001	D					
		Phenol rocatechol	<u> </u>	001	98.0%	 120-80-9	0.01	NA	0.03	· ·	<0.001 0.02	D C					
	<u>' y</u>	OCERCONO	•	001	30.070	120-00-9	0.01	19/5	0.00		0.02	Ŭ					
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						;	State of	Louisiana	l			·			Date of Sub	mittal
					Emissions I	nventory	Questic	nnaire (E	IQ) fo	or Air Pol	llutants				February :	2010
	Emission Point ID			Descriptiv	e Name of the Em	nissions Sou	rce (Alt. Na	ame)			Approximate Loc	ation (	of Stack or '	Vent (see i	nstructions)	
TE	202	n ID No			Vent Scrub	ber C-68	5			Method UTM Zone Latitude	N/ 15 Horizontal 30 degrees	673,		Datum Vertical sec 2		
	EQT0056									Longitude			min <u>27</u>	sec 7	hundredths	
	k and Discharge Physical haracteristics	Diameter Stack Disch Area	arge   Heig	ht of Stack ove Grade	Stack Exit Velocity	Stack Gas at Condition not at Stan	ons, Sta	ck Gas Exit mperature	Oper	lormal ating Time s per year)	Date of Construction or Modification		Percent Jan - Mar		Throughput ssion Point Jul - Sep	through Oct - Dec
	Change? No	0.33	ft ft²	85 ft	75.4 ft/sec	387	ft³/min Aı	mbient °F		8760	After 1988		25%	25%	25%	25%
			Heat Input	(see instruct							g Parameters (inlu	ide uni	ts)			
Fuel	Туре с			Heat Input (	(MM Btu/hr)						/Parameter			Descrip	tion	
a b c	N.	A				Maximum 0 Design Car	Operating Footing Footing	e/Throughpu tate/Through me		NA						
			Notes			Shell Heigh										
						Tank Diam										
							O Fixe			ng Roof	O External Flo	ating	Roof O	Internal Flo	pating Roof	
	Emission Point ID							ecific Info	rmatic	on						
	(Alternate ID	)	Control	Control		Propos	ed Emission	n Rates	Pe	ermitted	Add, Change,	Co	ntinuous			
	202		Equipment Code	HAP/TAP CAS Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	Emis	ssion Rate ons/yr)	Delete, or Unchanged	Cor	npliance lethod	Concentra	ition in Gase Stack	es Exiting at	
	Pollutant PM <sub>10</sub>							1								
	SO <sub>2</sub>															
	NOx															
	CO								1							
	VOC Total		001	>98		0.16	1.12	0.78	ĺ	0.78	U					
	Pyrocatecho	l	001	>98	120-80-9	0.01	0.05	0.02	•	<0.001	С					
	Hydroquinon	е	001	>98	123-31-9	0.001	0.05	<0.01		0.003	U					
	Methanol		001	>98	67-56-1	0.001	0.005	<0.01		0.003	Ü					
	Phenol								ļ	0.003	D					
⊢									├─							
$\vdash$									<del>                                     </del>							
⊢																
$\vdash$								<del>                                     </del>			2000	·····				
						<del> </del>		1	<del> </del>							
								<u> </u>								
									<u> </u>			L	***			

Emissions Inventory Questionnaire (EIQ) for Air Pollutants  Emission Point ID No. (Alternate ID)  203  Emissions Inventory Questionnaire (EIQ) for Air Pollutants  Approximate Location of Stack or Ventom Method  N/A	Datum NAD 8 /ertical 3,376,883	33
(Alternate ID)  Approximate Location of Stack or Vent  Method N/A	Datum NAD 8 /ertical 3,376,883	
7/13	/ertical 3,376,883	
Baghouse for HO/PC Handling UTM Zone 15 Horizontal 6/3,594 mE	4 hundredths	mN
TEMPO Subject Item ID No.  EQT0075  EQT0075  Eagnouse for Fig./Fig. Hariding  Latitude 30 degrees 30 min 42 sec  Longitude 91 degrees 11 min 27 sec		
Physical Stack Discharge Above Grade Velocity at Conditions, Stack Gas Exit Operating Time Or Modification The	nnual Throughput throus is Emission Point r - Jun   Jul - Sep   C	ough Oct - Dec
Change? 0.50 #	25% 25%	25%
Type of Fuel Used and Heat Input (see instructions)  Operating Parameters (inlude units)	<u> </u>	
	Description	
a NA Normal Operating Rate/Throughput NA b Maximum Operating Rate/Throughput c Design Capacity/Volume		
Notes Shell Height (ft)		
Tank Diameter (ft)		
○ Fixed Roof ○ Floating Roof ○ External Floating Roof ○ Inte	rnal Floating Roof	
Emission Point ID No. Air Pollutant Specific Information		
(Alternate ID)  Control Control LARGAR CAS  Proposed Emission Rates  Permitted Add, Change, Continuous		
203 Equipment Equipment Number Number (lb/br) (lb/br) (tops/vr) Inchanged Method	ncentration in Gases E Stack	Exiting at
Pollutant		
PM <sub>10</sub> 017 98% 0.04 0.09 0.02 0.46 C		
SO <sub>2</sub> NOx		
CO CO		
VOC Total		
Hydroquinone 017 98% 123-31-9 0.04 0.09 0.02 0.31 C		
Pyrocatechol 017 98% 120-80-9 0.04 0.09 0.02 0.15 A		

							State	of Louisia	na						Date of Sub	mittal
					Emissions					for Air Po	llutante				February	
F	mission Point II	) No		Descriptiv	e Name of the Er											
	(Alternate ID			Descriptiv	re isame of the Li	1110010110 001	uice (Ait	. Ivaille)			Approximate Lo	cation	of Stack or	Vent (see	nstructions)	
	301	,								Method	N	/A		Datun	n NA	D 83
				Phenolic Re	actor Vent Scr	ubber C-1	ona (Pa	RID E201\		UTM Zone				• Vertica		
TEM	PO Subject Iter	m ID No.		T HOHORO TO	actor veril oci	abbei 0-2	203 (1 (	UI.D. 1 201)		Latitude	30 degrees				hundredths	
	EQT0076	;								Longitude	91 degrees	11	min 29	_sec2	hundredths	3
	and Discharge	Diamete		Height of Stack	Stack Exit	Stack Gas		Stack Gas Ex		Normal	Date of Constru	ction	Percen	t of Annual	Throughput	through
	hysical	Stack Discl	narge	Above Grade	Velocity	at Conditi	ions,	Temperature	Ope	rating Time	or Modification				ssion Point	
	racteristics hange?	Area 0.25	_			not at Star	ndard	•	(hou	ırs per year)			Jan - Mar	Apr - Jur	Jul - Sep	Oct - Dec
	No No	0.20	ft <sup>2</sup>	35 ft	9.45 ft/sec	28	ft³/min	Ambient °F		8760	After 1989		25%	25%	25%	25%
	Type of Fu	el Used and	Heat I	nput (see instruc	tions)	· · · · · · · · · · · · · · · · · · ·				Operatin	g Parameters (inlu	ude ur	nits)	<del></del>	<u>. I</u>	<u> </u>
Fuel		of Fuel		Heat Input	(MM Btu/hr)						e/Parameter		·	Descrip	tion	
а	<b>N</b>	IA						Rate/Through		NA						
b								g Rate/Throug	phput							
C			Notes			Design Ca Shell Heigh		olume				┡—				
			110103			Tank Diam										
								ixed Roof (	Float	ling Roof	O External Flo	oating	Roof O	Internal F	oating Roof	
Е	mission Point II	D No.				Air Po	llutant	Specific Inf								
	(Alternate ID	))			l			ssion Rates			Add Of server		41			
	301		Cont Equipr		HAP/TAP CAS	Average	Maxim	um Annual	1	ermitted ission Rate	Add, Change, Delete, or		ontinuous empliance	Concentr	ation in Gase	s Exiting at
			Cod		Number	(lb/hr)	(lb/h	1	i	(tons/yr)	Unchanged		Method		Stack	
	Pollutant PM <sub>10</sub>					``	<u> </u>	, , ,	_			ļ		ļ		
<b></b>	SO <sub>2</sub>						<u> </u>									
	NOx						<del> </del>		+							
	CO											<del></del>				
	VOC Total		00			0.04	24.0			0.19	U					
	Hydroquinor	ne	00		123-31-9	<0.001	0.30			0.003	U					
	Phenol	- I	00 00		108-95-2	0.04	21.0			0.17	U					
	Pyrocatecho	)I	00	1 ≥99.9	120-80-9	0.01	2.70	0.02		0.02	U					
							-		+							
							1		+							
<u> </u>		***************************************														
			<u> </u>						-							
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							State of	f Louisiana	3						Date of Si	ıbmittal
					<b>Emissions</b>	Inventory	/ Questi	ionnaire (E	IQ) f	or Air Po	llutants				February	/ 2010
Er	nission Point II (Alternate ID			Descriptiv	e Name of the Er	nissions So	urce (Alt. I	Vame)			Approximate Lo	cation	of Stack or	Vent (see	instructions	)
	302									Method		/A		Datu		AD 83
TEM	PO Subject Iter			Tank F	arm Scrubber	C-319 (P	'&I.D. F1	107)		UTM Zone Latitude Longitude	30 degrees	30	min 39		cal 3,376, 5 hundredth 9 hundredth	ıs
P Char	nd Discharge hysical acteristics hange?	Diameter Stack Disch Area 0.25	narge ft	Height of Stack Above Grade 32 ft	Stack Exit Velocity 20,7 ft/sec	Stack Gas at Conditi not at Star	ons, St ndard	ack Gas Exit emperature	Ope	Normal rating Time rs per year) 8760	Date of Construe or Modification		Jan - Mar	This Er	<u> </u>	Oct - Dec
	No Trans of Fi	-1111	ft <sup>2</sup>			01	a ziniai z	ZITIDICIT 1.	<u> </u>				25%	25%	25%	25%
Fuel	Type of Fu		Heat I	nput (see instruct Heat Input (							g Parameters (inlu	ide un	its)		1 41	
a b c	N			ricat input (			Operating	ite/Throughpu Rate/Through ume		NA NA	/Parameter			Descr	iption	
			Notes			Shell Heigh	nt (ft)	****								
						Tank Diam		ed Roof	Float	ing Roof	O External Flo	pating	Roof O	Internal I	loating Roof	*******
En	nission Point IE					Air Pol	llutant S	pecific Info	mati	on					·····	
	(Alternate ID	)	Cont Equipr	nent Equipment	HAP/TAP CAS	Average	ed Emissi Maximur	n Annual		ermitted ssion Rate	Add, Change, Delete, or		ntinuous mpliance	Concent	tration in Gas Stack	es Exiting at
	Pollutant		Coo	de Efficiency		(lb/hr)	(lb/hr)	(tons/yr)	(1	tons/yr)	Unchanged	N	/lethod		Stack	
	PM <sub>10</sub>															
	SO <sub>2</sub> NOx															
	CO												***************************************	ļ	***	
	VOC Total		00	1 ≥98		0.08	16.04	0.34		0.24	С					
	Phenol		00	1 ≥98	108-95-2	0.005	2.54	0.02		0.02	U		wat.		****	
						_	******					T-14.00			**************************************	
					T-10-1		l	_L					····	L		

							State of	Louisiana	3						Date of Su	bmittal
					<b>Emissions</b>	Inventory	y Questic	onnaire (E	IQ) f	or Air Po	llutants				February	2010
	on Point ID ternate ID)			Descriptiv	e Name of the En	nissions So	urce (Alt. N	ame)	-		Approximate Loc	cation	of Stack or	Vent (see i	nstructions)	
TEMPO SU	303 ubject Item QT0089	ID No.		Solvent	Vent Scrubbe	er C-402 (i	P&I.D. F4	102)		Method UTM Zone Latitude Longitude	15 Horizontal 30 degrees	30	539 mE min 41 min 29			3
Stack and Dis Physica Characteri	al S	Diameter Stack Disch Area	narge   <sup>l</sup>	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ions, Sta	ck Gas Exit emperature	Oper	Normal rating Time rs per year)	Date of Construe or Modification		Percen Jan - Mar	This Emi	Throughput ssion Point Jul - Sep	through
Change No	e?	0.25	ft ft²	35 ft	7.5 ft/sec	22.1	ft³/min A	mbient °F		8760	After 1989		25%	25%	25%	25%
Ty	ype of Fue	Used and	Heat Ir	put (see instruct	ions)		<u> </u>	***************************************		Operatin	g Parameters (inlu	ıde un	its)	<u> </u>	1	1
-uel	Type of			Heat Input (	MM Btu/hr)						Parameter			Descrip	tion	
a b c	NA						Operating F	e/Throughpu Rate/Through me		NA						
			Notes			Shell Heigh	nt (ft)									
						Tank Diam	O Fixe	d Roof			C External Flo	oating	Roof O	Internal Flo	oating Roof	
	on Point ID	No.						ecific Info	rmatio	on						
(Alt	ternate ID) 303		Contr	nent Equipment	HAP/TAP CAS Number	Average	sed Emission Maximum	Annual	Emis	ermitted ssion Rate	Add, Change, Delete, or	Co	ntinuous mpliance	Concentra	ation in Gase Stack	es Exiting at
	Pollutant		Code	e Efficiency		(lb/hr)	(lb/hr)	(tons/yr)	(1	tons/yr)	Unchanged	ľ	/lethod		01.0011	
	PM <sub>10</sub>														***************************************	
	SO <sub>2</sub>								<u> </u>							
	NOx CO						ļ		<u> </u>							
V	OC Total		001	≥95		0.82	8,21	3.68	-	3.6	С					-
	Phenol		. 001		108-95-2	<0.001	0.01	<0.01		<0.001	C					
					***************************************											
							<u> </u>					L		L		

							State o	f Louisiana	ı						Date of Sub	mittal
					<b>Emissions</b>	Inventory	Quest	ionnaire (E	IQ) f	or Air Po	llutants				February :	2010
Er	nission Point II (Alternate ID			Descripti	ve Name of the Er	missions Sou	ırce (Alt.	Name)			Approximate Loc	ation	of Stack or	Vent (see i	nstructions)	
	304									Method	N/			Datun		D 83
TEMI	PO Subject Iter	n ID No.		PC Flake	r Vent Scrubb	er C-561 (	P & I.D	. F508)		UTM Zone Latitude	15 Horizontal 30 degrees		,541 mE min 42	Vertica	3,376,8 hundredths	
	EQT0094														hundredths	
<u> </u>					-	•			····					•	•	
	nd Discharge hysical	Diamete Stack Discl		Height of Stack	Stack Exit	Stack Gas at Conditi		tack Gas Exit		Normal rating Time	Date of Construc		Percent		Throughput ssion Point	through
	acteristics	Area	~	Above Grade	Velocity	not at Star		Temperature		rs per year)	or Modificatio	n	Jan - Mar		Jul - Sep	Oct - Dec
С	hange? No	0.25	ft ft²	35 ft	2.7 ft/sec	7.95	ft³/min	Ambient °F		8760	After 1989		25%	25%	25%	25%
			Heat Ir	nput (see instru							g Parameters (inlu	de un	its)			
Fuel		of Fuel		Heat Input	(MM Btu/hr)						e/Parameter			Descrip	tion	
a b c	N					Maximum ( Design Car	Operating pacity/Vol	ate/Throughpu Rate/Through lume		NA						
			Notes			Shell Heigh										
						Tank Diam		red Roof	Floor	I ing Roof	External Flo	oting	Post O	Internal El	oating Roof	
Fr	nission Point II	) No	<u> </u>			Air Dol		Specific Info			O External Fig.	aung	KOOI C	internal ri	oating Rooi	*****
	(Alternate ID				I			sion Rates						1		
	304		Cont Equipn Cod	nent Equipment	HAP/TAP CAS Number	Average	Maximu	m Annual	Emi	ermitted ssion Rate	Add, Change, Delete, or	Co	ntinuous mpliance	Concentra	ation in Gase Stack	s Exiting at
	Pollutant		000	Lincichey		(lb/hr)	(lb/hr)	(tons/yr)	(	tons/yr)	Unchanged	IV.	Method			
	PM <sub>10</sub>															
	SO₂ NOx															
	CO				<u> </u>			******	<u> </u>							
	VOC Total		00	1 ≥95		0.01	0.30	0.05		0.05	U					
	Pyrocatecho	i	00.	1 ≥98	120-80-9	0.01	0.30	0.05		0.05	U					
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					Emissions I	Inventory	Questi	onnaire (E	IQ) f	or Air Pol	llutants				February 2	2010
1	Emission Point II (Alternate ID			Descriptiv	e Name of the En	nissions Sou	rce (Alt. N	ame)			Approximate Loc	ation of	f Stack or	Vent (see in	structions)	
	306		Se	eal Pot O-	-669 For Chrys	stallization	(P&I D	F-607)			N/ 15 Horizontal	673,5		Datum Vertical	3,376,9	
TE	MPO Subject Iter EQT0097			Jul. 1 J. J			. (	,		Latitude Longitude	30 degrees 91 degrees	30 m 11 m	nin <u>43</u> nin <u>29</u>		hundredths hundredths	
	and Discharge Physical	Diameter Stack Disch	ame Heig	ht of Stack	Stack Exit Velocity	Stack Gas at Condition	nne   Sta	ick Gas Exit		Normal ating Time	Date of Construction		Percent		Throughput t sion Point	hrough
	aracteristics Change?	Area 0.33	ft	70 ft	2.0 ft/sec	not at Stan	ft³/min	NA °F	(hou	rs per year) 8760	After 1989	' <u>.</u>	Jan - Mar 25%	Apr - Jun 25%	Jul - Sep 25%	Oct - Dec 25%
	No		ft²													
Fuel		ei Usea and of Fuel		(see instruct Heat Input (							g Parameters (inlu e/Parameter	ae units	s)	Descript	ion	
a		A		near input (	(MIM DIU/HI)	Normal One	erating Ra	te/Throughpu	t	Value NA	/Farameter			Descript	IUII	
b c							Operating I	Rate/Through								
			Notes			Shell Heigh										
						Tank Diame			************							
										ing Roof	O External Flo	ating R	Roof O	Internal Flo	ating Roof	·
1	Emission Point II							pecific Infor	mati	on						
	(Alternate ID	)	Control	Control		Propos	ed Emissi	on Rates	P	ermitted	Add, Change,	Conf	tinuous			
	306		Equipment Code	Equipment Efficiency	HAP/TAP CAS Number	Average (lb/hr)	Maximun (lb/hr)	Annual (tons/yr)	Emis	ssion Rate tons/yr)	Delete, or Unchanged	Com	pliance ethod	Concentra	tion in Gase Stack	s Exiting at
	Pollutant					(,	(,	(,-,-	<u> </u>							
<u> </u>	PM <sub>10</sub> SO <sub>2</sub>							+								
	NOx							+								
<del>                                     </del>	co														· · · · ·	
	VOC Total		000			0.02	0.03	0.06		0.06	U					
	Hydroquinon	ie	000		123-31-9	0.01	0.02	0.04		0.04	U					
<u> </u>									_					1		
								+					• • • • • • • • • • • • • • • • • • • •			
						-		-								
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					<b>Emissions</b>	Inventory	Questio	nnaire (E	IQ) for Air Po	llutants			February	2010
Er	nission Point ID (Alternate ID			Descriptiv	e Name of the En	nissions Sou	irce (Alt. Na	ime)		Approximate Loc	ation of Stack or	Vent (see i	nstructions)	
	307		_						Method	N/		Datum		D 83
***************************************			Su	ılfite Metabisu	ılfite Bag Dum <sub>l</sub>	'	3aghouse	: S-0603 f	1			Vertica		
TEMI	PO Subject Iter	n ID No.			De	801			Latitude	30 degrees	30 min 43		hundredthe	
***************************************	EQT0106					***************************************			Longitude	91 degrees	11 min 29		hundredths	
F	nd Discharge hysical racteristics	Diamete Stack Discl Area	harge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi- not at Star	ons, Stac	k Gas Exit mperature	Normal Operating Time (hours per year)	Date of Construction	tion		Throughput ssion Point Jul - Sep	
	hange? No	0.50		23 ft	34.0 ft/sec		ļ	nbient °F	8760	After 1989	25%	25%	25%	25%
		L el Used and		nput (see instruc	tions)		<u> </u>		Operatir	ı ıg Parameters (inlu	de units)	<u> </u>	<u>.L</u>	
Fuel		of Fuel	1		(MM Btu/hr)					e/Parameter		Descrip	tion	
a b		IA		•	,	Maximum (	Operating R	e/Throughpu ate/Through	t NA					
С			11-4			Design Cap		ne						
			Notes			Shell Heigh Tank Diam								
						Tank Diam	Fixed	I Boof	Floating Roof	O External Flo	esting Poof	Internal El	oating Roof	
E-	nission Point II	) Na	г -			Air Dol	_	ecific Info		Caxternal Fig	alling Rooi C	miemai Fi	oating Root	
	(Alternate ID			<del>- 1</del>	1		ed Emissio		Т			1		
	307	,	Cont Equipr	ment Equipment	HAP/TAP CAS Number	Average	Maximum	Annual	Permitted Emission Rate	Add, Change, Delete, or	Continuous Compliance	Concentra	ation in Gase Stack	es Exiting at
	Pollutant		Cod	fe Efficiency		(lb/hr)	(lb/hr)	(tons/yr)	(tons/yr)	Unchanged	Method			
	PM <sub>10</sub>		01	7 99.90%		0.001	0.002	<0.01	0.004	С				
	SO₂													
	NOx													
	CO													
	VOC Total						•							
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	*				<b>Emissions</b>	nventory	Questio	nnaire (E	IQ) fo	or Air Po	liutants				February	2010
	Emission Point ID			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. Na	me)			Approximate Loca	ation of Sta	ack or V	/ent (see ir	structions)	
	308	,								Method	N/A			Datum		D 83
		155.51	Oxa	lic Acid Bag D	ump Station B	-	S-663 for	D-660 (P			15 Horizontal		mE	Vertical		
11111	MPO Subject Iter				F6	08)				Latitude Longitude		30 min 11 min			hundredths	
	EQT0107	'								Longitude	degrees	<u> </u>		sec <u> </u>	. Hunureum	•
	k and Discharge Physical haracteristics Change?	Diametei Stack Discl Area 0.50	harge	Height of Stack Above Grade 23 ft	Stack Exit Velocity 34.0 ft/sec	Stack Gas at Conditi not at Star	ons, Stac dard Ter	k Gas Exit nperature nbient °F	Oper (hour	Normal ating Time s per year) 8760	Date of Construct or Modification After 1989	Jan -			Throughput sion Point Jul - Sep 25%	Oct - Dec
	No	414	ft²			400	плиша Дн	IDIGIT 1	<u> </u>				7/0	2576	2576	20/0
Fuel		el Used and of Fuel	Heat I	nput (see instruct Heat Input (	·				I		g Parameters (inlud e/Parameter	de units)		Descript	ion	
a	Type (		$\dashv$	rieat iriput (	(IVIIVI DIG/III)	Normal One	erating Rate	/Throughpu	ıt l	NA	#Farameter			Descript	IOH	
b						Maximum (		ate/Through								
			Notes			Shell Heigh										
						Tank Diam										
			Y				O Fixed			ng Roof	External Floa	ating Roof	$\circ$	Internal Flo	ating Roof	
	Emission Point II			· , , , , , , , , , , , , , , , , , , ,				ecific Infor	rmatio	on		***************************************			***************************************	
	(Alternate ID	')	Conf	trol Control	HAP/TAP CAS	Propos	ed Emission	n Rates	Pe	ermitted	Add, Change,	Continuo	ous	C	tion in Coo	es Exiting at
	308		Equipr Cod	1 ' '	Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)		ssion Rate ons/yr)	Delete, or Unchanged	Compliar Methor	nce	Concentra	Stack	es Exiling at
	Pollutant PM <sub>10</sub>		01	7 99.90%		0.001	0.002	<0.01		0.004	С					
	SO <sub>2</sub>		01	7 99.90 /6		0.001	0.002	\0.01		0.004						
	NOx							<u> </u>								
	co				***************************************											
	VOC Total															
										•						
							<u> </u>									
								<u> </u>	<b> </b>							
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								State of	Louisiana	)						Date of Sub	mittal
						Emissions	nventory	Questic	nnaire (E	IQ) fo	r Air Pol	llutants				February 2	2010
	Em	ission Point ID		***************************************	Descriptiv	e Name of the En	nissions Sou	rce (Alt. Na	ıme)			Approximate Loca	ation o	f Stack or '	Vent (see in	structions)	
		(Alternate ID)	)								Viethod	N/A		· · · · · · · · · · · · · · · · · · ·	Datum	•	o 83
		309		Pre-C	oat Bag Du	ımp Station Ba	ghouse S	6-631 for	D-628 (P&			15 Horizontal	`	mE	Vertical	INAL	mN
TE	EMP	O Subject Iten	n ID No.			F6	03)			Įι	atitude	degrees			sec	hundredths	
		EQT0108								Į.	_ongitude	degrees	n	nin	sec	hundredths	
Stac	- 1	nd Discharge	Diameter		ght of Stack	Stack Exit	Stack Gas	Sta.	k Gas Exit		ormal	Date of Construct	tion	Percent		Throughput	through
С	1	nysical acteristics	Stack Disch Area	large Ab	ove Grade	Velocity	at Condition	ם ו	mperature	-	ating Time s per year)	or Modification	1 -	Jan - Mar		sion Point Jul - Sep	Oct - Dec
		nange?		ft	ft	#/000			°F	(House	por your,		-	Jail - Iviai	Apr - Juli	Jul- Jep	Oct - Dec
		No		ft²		ft/sec		ft³/min	F								
Fuel	1	Type of Fue Type o		Heat Inpu	t (see instruc Heat Input							g Parameters (inluc	de unit	s)	D	1	
a		N,			near input	(IVIIVI BLU/III)	Normal Op	erating Rati	e/Throughpu	+	Value NA	/Parameter			Descript	ion	
b								-	ate/Through								
С							Design Cap		ne								
				Notes			Shell Heigh			1							
							Tank Diam							$\triangle$			
-							<u> </u>	O Fixed			ng Roof	O External Floa	ating F	Roof U	Internal Flo	ating Roof	
	⊨m	nission Point ID (Alternate ID)	1						ecific Infor	matio	<u>n</u>						
		309	' l	Control Equipment	Control Equipment	HAP/TAP CAS	Average	ed Emissio Maximum	Annual		rmitted sion Rate	Add, Change, Delete, or		itinuous ipliance	Concentra	tion in Gase	s Exiting at
		Pollutant	-	Code	Efficiency	Number	(lb/hr)	(lb/hr)	(tons/yr)		ons/yr)	Unchanged		ethod		Stack	
		PM <sub>10</sub>								C	0.001	D					
		SO <sub>2</sub>													***************************************		:
		NOx CO				***************************************											·····
		VOC Total			-												
		700 70101															
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	-	<del></del>		:	†		······										
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		······································			1			***************************************	1								

								State of	Louisiana	1						Date of Sul	omittal
	-					<b>Emissions</b> l	Inventory	Questio	nnaire (E	IQ) f	or Air Po	liutants				February	2010
E	mission Point II (Alternate ID			De	escriptive	e Name of the En	nissions Sou	irce (Alt. Na	ıme)			Approximate Loc	ation o	of Stack or	Vent (see i	nstructions)	
	310					0 =					Method	N//			Datum	·	D 83
TEN	/IPO Subject Iter	n ID No		arbon B	sag Dui	mp Station Ba	-	-615 tor L	)618 (P&I	D	UTM Zone				Vertica	**	
'="						F6	01)				Latitude Longitude	30 degrees 91 degrees	30 r	nin <u>43</u> nin <u>29</u>		hundredths hundredths	
	EQT0109										Longitudo	ucgrees _	<del></del> '	11111 <u>23</u>			·
	and Discharge Physical aracteristics	Diamete Stack Disc Area	harge	Height of Above G		Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Stac	k Gas Exit nperature	Oper	Normal ating Time rs per year)	Date of Constructor Modification	, L	Percent Jan - Mar	This Emi	Throughput ssion Point Jul - Sep	through Oct - Dec
'	Change?	0.50	ft	2:	23 ft	34,0 ft/sec	400	ft³/min An	nbient °F	-	8760	After 1989	<u> </u>	25%	25%	25%	25%
	No		ft²					K // // // // // // // // // // // // //	IDICIN I						25%	25%	25%
Fuel		el Used and of Fuel	Heat			ions) MM Btu/hr)						g Parameters (inlude/Parameter	de unit	s)	Descrip	£	
a		A		1100	<u>at input (</u>	WIWI Diamin)	Normal Op-	erating Rate	/Throughpu	t	NA NA	arameter .			Descrip	uon	
b									ate/Through								
C							Design Car		ne								
<b></b>	<del>-</del>		Notes				Shell Heigh										
							Tank Diam	Fixed	I Poof	Floati	Iing Roof	O External Flo	otina C	Poof O	Internal El	oating Roof	
├ F	: Emission Point II	) No.	<u> </u>				Δir Pol		ecific Infor			C External Flo	aung r	(00i <u>)</u>	internal Fi	baung Rooi	
	(Alternate ID				T			ed Emissio					_		<b></b>		
	310		Con Equip Cor	ment Equ	Control uipment ficiency	HAP/TAP CAS Number	Average	Maximum	Annual	Emis	ermitted ssion Rate	Add, Change, Delete, or	Con	itinuous ipliance	Concentra	ation in Gase Stack	s Exiting at
	Pollutant						(lb/hr)	(lb/hr)	(tons/yr)	(1	tons/yr)	Unchanged	IVI	ethod			
<u> </u>	PM <sub>10</sub>		01	17 99	9.90%	***************************************	0.001	0.001	<0.01		0.003	С					
<del>                                     </del>	SO₂ NOx							••••									
<u> </u>	CO																
	VOC Total																
<u> </u>			_						<b></b>				***************************************		<u> </u>		
			ļ														
<u> </u>			<u> </u>														
<u> </u>																	
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<u> </u>														<del></del>		***************************************	
<u> </u>			<u> </u>				L		L								

						;	State of	Louisiana	1						Date of Sul	omittal
					<b>Emissions</b>	Inventory	Questi	onnaire (E	IQ) f	or Air Po	llutants				February	2010
!	Emission Point ID (Alternate ID			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. N	lame)			Approximate Loc	cation	of Stack or	Vent (see	e instructions)	
·····	311			PC Pack	aging Baghou	se Y-731 (	(P&LD. I	F703)		Method UTM Zone	15 Horizontal			Datu Vertic	cal 3,376,9	
TE	MPO Subject Iter EQT0110		:				(			Latitude Longitude	30 degrees 91 degrees		min 43 min 28	sec 2	hundredths hundredths	
	and Discharge Physical aracteristics	Diameter Stack Discl Area	name   +	leight of Stack Above Grade	Stack Exit Velocity	Stack Gas at Condition	ons, Sta	ack Gas Exit emperature	Oper	Normal rating Time rs per year)	Date of Construction		Percent Jan - Mar		al Throughput mission Point in Jul - Sep	-
	Change? No	0.50	ft ft²	59 ft	42.5 ft/sec	500	ft³/miл Д	mbient °F	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	8760	After 1989		25%	25%	25%	25%
			Heat In	put (see instruct						Operatin	g Parameters (inlu	ıde ur	nits)			
Fuel	Туре			Heat Input (	(MM Btu/hr)						/Parameter			Descr	ription	
a b c	N	A					perating	te/Throughpu Rate/Through ime		NA						
			Notes			Shell Heigh	t (ft)									
						Tank Diame		ed Roof	Floati	l ing Roof	O External Fig	nating	Poof O	Internal	Floating Roof	
	Emission Point ID	) No				L Air Dall		pecific Infor			Catemairi	Jaung	11001	IIICITIALI	ribating Root	·····
	(Alternate ID						ed Emissi		IIIaui	UII						
	311	,	Contro Equipmo Code	ent Equipment	HAP/TAP CAS Number	Average	Maximun	n Annual	Emis	ermitted ssion Rate	Add, Change, Delete, or	Co	ntinuous mpliance	Concent	tration in Gase Stack	es Exiting at
	Pollutant		Code	Eniclesicy		(lb/hr)	(lb/hr)	(tons/yr)	()	tons/yr)	Unchanged	ľ	Viethod			
	PM <sub>10</sub>		017	98%		0.05	0.10	0.22		0.38	C				***************************************	
	SO <sub>2</sub>															
	NOx CO															
	VOC Total															
	Pyrocatecho	l	017	98%	120-80-9	0.05	0.10	0.22		0.38	С					
<u> </u>						;			L			I		l		

								State of	of Louisian	3						Date of Sub	mittal
						<b>E</b> missions	Inventory	/ Ques	tionnaire (E	iQ) f	or Air Po	llutants			ŀ	February	2010
Er	nission Point II (Alternate ID			De	escriptiv	e Name of the Er	missions So	urce (Alt.	Name)			Approximate Loc	cation	of Stack or	Vent (see ir	nstructions)	
	312										Method		/A		Datum		D 83
TEMP	PO Subject Iter	n ID No.	ł	HC	Q Pack	aging Baghou	se Y-716	(P&I.D	. F703)		Latitude	15 Horizontal 30 degrees		<u>,550</u> mE min 43	Vertical	3,376,9 hundredths	
	EQT0111											91 degrees		min 28			
P	nd Discharge hysical	Diamete Stack Disc	harge	Height of		Stack Exit Velocity	Stack Gas at Conditi	ions,	Stack Gas Exit Temperature	Ope	Normal rating Time	Date of Construction		Percent		Throughput sion Point	through
	acteristics	Area		110010	Olugo	Volocity	not at Star	ndard	remperature	(hou	rs per year)	Of Modification	111	Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
	hange? No	0.50	ft²		9 ft	42.5 ft/sec	500	ft³/min	Ambient °F		8760	After 1989		25%	25%	25%	25%
		el Used and	Heat I									g Parameters (inlu	ıde un	its)		***************************************	
Fuel		of Fuel		Hea	at Input	(MM Btu/hr)						e/Parameter			Descript	ion	
a b c	NA Notes						Maximum ( Design Car	Operating pacity/Vo	Rate/Throughpu g Rate/Through Dlume		NA						
			Notes				Shell Heigh										
							Tank Diam		ixed Roof	Elect	ing Roof	O External Flo		Doof O	Internal Flo		
Fr	nission Point II	) No	T .				Air Dol		Specific Info			O External Fit	baung	ROOI U	internal Fic	ating Root	
	(Alternate ID					""			sion Rates					**	T		
	312	•	Cont Equips		control uipment	HAP/TAP CAS Number	Average	Maximu			ermitted ssion Rate	Add, Change, Delete, or		ntinuous mpliance	Concentra	tion in Gase	s Exiting at
	Pollutant		Cod	de Effi	ficiency	Number	(lb/hr)	(lb/hr	(tons/yr)	(	(tons/yr)	Unchanged	N	Method		Stack	
	PM <sub>10</sub>		01	7 9	98%		0.05	0.10	0.22		0.38	C					
	SO <sub>2</sub>																
	NOx													***************************************			
	CO VOC Total		r														
	Hydroquinon	e	01	7 0	98%	123-31-9	0.05	0.10	0,22	<del>                                     </del>	0.38	С					
	. i y di oquillo.		<u> </u>	<del>'</del>	0070	120-01-0	0.00	0.10	, <u> </u>		0.30						
												· · · · · · · · · · · · · · · · · · ·					***************************************
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							<del> </del>	-		-					ļ		
			<del> </del>						-	<del>                                     </del>					<u> </u>		
			<u> </u>				I			.L					L		

						ţ	State of	Louisiana	1						Date of Sub	mittal
					Emissions	Inventory	Questic	nnaire (E	IQ) f	or Air Pol	lutants				February 2	2010
	Emission Point II (Alternate ID			Descriptiv	e Name of the En	nissions Sou	rce (Alt. Na	ame)			Approximate Loc	ation of	Stack or \	Vent (see in	structions)	
	313	,								Method	N/			Datum		O 83
		15.11	HQ Re	work Dun	per Baghouse	S-693 fo	r D607 (F	%I.D. F60	(2)	UTM Zone	15 Horizontal		3 mE	Vertical	3,376,8	
1 =	MPO Subject Ite						`		,	Latitude Longitude	30 degrees 91 degrees	30 mi	in <u>42</u> in 28		hundredths hundredths	
	EQT0112	2								Longitudo		<del></del>			.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Stac	and Discharge	Diamete	I Heir	ht of Stack	Stack Exit	Stack Gas	Sta	ck Gas Exit		Vormal	Date of Construc	tion	Percent	of Annual T		hrough
C	Physical naracteristics	Stack Disc Area	narge Ah	ove Grade	Velocity	at Condition	, I D	mperature		rating Time rs per year)	or Modification	n L	an - Mar	This Emis Apr - Jun		Oct - Dec
	Change? 0.50 ft No ft²  Type of Fuel Used and Heat In			59 ft	34.0 ft/sec			nbient °F	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	8760	After 1989	<u> </u>	25%	25%	25%	25%
	-	el i lead and		lega instruc	lione)					Operation	g Parameters (inlu	de units	<u> </u>			
Fuel			i roat input								/Parameter	ao amto		Descripti	on	
a b c	N	Type of Fuel Heat Input (MM Btu					Operating Roacity/Volur	e/Throughpu ate/Through ne		NA						
			Notes			Shell Heigh				1						
						Tank Diame	eter (ft) Fixe	d Doof	Floor	l ing Roof	External Flo	otion De	oof O	Internal Flo	oting Doof	
	Emission Point I	D No.	<del></del>			Air Dol		ecific Info		_	O External Fig	aurig Ko	301	internal Flo	ating Root	
	(Alternate II			T			ed Emissio									
	313		Control Equipment	Control Equipment	HAP/TAP CAS	Average	Maximum			ermitted ssion Rate	Add, Change, Delete, or		inuous oliance	Concentrat		s Exiting at
	Pollutant		Code	Efficiency	Number	(lb/hr)	(lb/hr)	(tons/yr)		tons/yr)	Unchanged		thod		Stack	
	PM <sub>10</sub>		017	98%		0.01	0.01	0.02		0.38	С					
	SO <sub>2</sub>															
	NOx															
	CO VOC Tota							<u> </u>								
<b></b>	Hydroquinor		017	98%	123-31-9	0.01	0.01	0.02		0.38	С					
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	į							+	<del>                                     </del>							
	E															
<u></u>									<del>                                     </del>							
<u> </u>				<del>                                     </del>		-		<del> </del>	$\vdash$							
L			1		L	<u> </u>		1	<u> </u>			l		L		

							State of	Louisiana					Date of Sub	omittal
					Emissions I	nventory	Questio	nnaire (E	IQ) for Air P	ollutants			February	2010
E	mission Point IE (Alternate ID			Descriptive	Name of the Em	nissions Sou	rce (Alt. Na	nme)		Approximate Lo	cation of Stack or	Vent (see	instructions)	
	315A	,							Method UTM Zor		I/A 673,496 mE	_ Datur Vertica		D 83 142 mN
TEM	PO Subject Iter			Fluid H	eater F-962 (f	Backup) (F	P&ID F92	27)	Latitude	30 degrees e 91 degrees		sec 4	hundredths	3
	EQT0113					ra a	I						Throughput	
F	and Discharge Physical racteristics	Diametei Stack Discl Area	harge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Condition not at Stan	ons, Stac	ck Gas Exit mperature	Normal Operating Tim (hours per yea	T OF MODIFICATION	ction	This Em	ission Point	Oct - Dec
C	Change? No	1	ft ft²	40 ft	44.2 ft/sec	2,085	ft³/min	700 °F	8760	After 1988	25%	25%	25%	25%
	Type of Fu	el Used and	Heat In	put (see instruct	ions)		•			ting Parameters (inl	ude units)			
Fuel	Type			Heat Input (	MM Btu/hr)					lue/Parameter		Descri	ption	
a b c	NA Notes					Maximum ( Design Car	Operating Roacity/Volur	e/Throughpu ate/Through ne		JA				
			Notes			Shell Heigh			Į					
						Tank Diam	eter (π) Fixe	d Boot	Floating Roof	O External FI	lacting Poof	Internal E	loating Roof	
	mission Point II	- A1-	T			Air Dal		ecific Infor		O External Fi	toating Root C	/ Internal i	loating (too)	
<b>—</b>	(Alternate ID						ed Emissio							
	315A	,	Contr Equipm Code	nent Equipment	HAP/TAP CAS Number	Average	Maximum	Annual	Permitted Emission Rat		Continuous Compliance Method	Concentr	ration in Gase Stack	es Exiting a
	Pollutant		Code	e Elliciency		(lb/hr)	(lb/hr)	(tons/yr)	(tons/yr)	Unchanged	Metriou			
	PM <sub>10</sub>		000			0.05	0.05	0.07	0.07	U				
	SO <sub>2</sub>		000			0.004	0.004	0.01	0.01	U				
	NOx CO		000			0.60	0.60 0.50	0.91 0.76	0.91 0.76	U			····	
	VOC Total		000			0.03	0.03	0.05	0.05	Ü				
													·····	
			<u> </u>											
			1											

						:	State of	Louisiana	l						Date of Sub	mittal
					Emissions I	Inventory	Questic	nnaire (E	IQ) for A	Air Pol	lutants				February	2010
En	nission Point ID (Alternate ID			Descriptive	e Name of the En	nissions Sou	rce (Alt. Na	ame)			Approximate Loc	ation	of Stack or	Vent (see in	structions)	
	315B	,								thod	N/ 15 Horizontal		500 mF	. Datum Vertical		D 83 42 mN
TEMF	O Subject Iten			Prima	ry Fluid Heate	r F-971 (F	'&ID F92	5)	Lat	itude	30 degrees	30	min 44 min 30	sec 4	hundredths	3
Pi Char	acteristics	Diameter Stack Disch Area	narge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Condition not at Star	ons, Sta	ck Gas Exit mperature	Norr Operatin (hours po	ng Time	Date of Constructor Modification		Percent Jan - Mar		sion Point	through Oct - Dec
CI	hange? No	2	ft ft²	15.8 ft	28.6 ft/sec	3,760	ft³/min	735 °F	876	60	1994		25%	25%	25%	25%
	Type of Fu	el Used and	Heat I	nput (see instruct	tions)					Operating	g Parameters (inlu	de ur	nits)			
Fuel	Type o	Heat Input (	(MM Btu/hr)		· · · · ·				/Parameter			Descript	ion			
a b c	NA Notes					Maximum ( Design Car	Operating Foodity/Volur	e/Throughpu tate/Through ne		NA 						
			Notes			Shell Heigh										
						Tank Diam										
							O Fixe		Floating	Roof	O External Flo	pating	Roof U	Internal Flo	ating Roof	
Εņ	nission Point II							ecific Info	mation		•			<del>,</del>		
	(Alternate ID 315B	')	Cont Equipr		HAP/TAP CAS	Propos · Average	sed Emission Maximum	n Rates Annual	Perm Emissio		Add, Change, Delete, or		ontinuous ompliance	Concentra		es Exiting at
	Pollutant		Coc	de Efficiency	Number	(lb/hr)	(lb/hr)	(tons/yr)	(tons	s/yr)	Unchanged		Method		Stack	
	PM <sub>10</sub>		00	0		0.06	0.06	0.27	0.2		U					
	SO₂		00		:	0.005	0.005	0.02	0.0		U					
	NOx		00			0.80	0.80	3.50	3.5		U					
	CO		00			0.67	0.67	2.94 0.19	2.9		U					
	VOC Total		00	iU		0.04	0.04	0.19	0.	19	U					
										•						
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			<del>                                     </del>			·	<u> </u>	1								

							State of	Louisiana	1						Date of Sub	mittal
					Emissions	inventory	Questic	nnaire (E	IQ) fo	or Air Pol	liutants				February :	2010
En	nission Point ID (Alternate ID			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. Na	ame)			Approximate Loc	ation	of Stack or	Vent (see ir	structions)	
1	316			_		<b>.</b>		_		Method UTM Zone	N/ 15 Horizontal		.100 mE	Datum Vertical		D 83 00 mN
TEMF	O Subject Iten			Press	sure Leaf Filter	r Drying V	ent Y-62	5		Latitude	30 degrees	30	min 29 min 8	sec 7	hundredths hundredths	3
P Char	nd Discharge hysical acteristics hange?	Diameter Stack Discl Area 0.33	harge ft	leight of Stack Above Grade 70 ft	Stack Exit Velocity 283.0 ft/sec	Stack Gas at Conditi not at Star 1,452	ons, Te	ck Gas Exit mperature mbient °F	Oper (hour	Normal rating Time rs per year) 8760	Date of Construction or Modification		Percent Jan - Mar 25%		Throughput sion Point Jul - Sep	_
	No Type of Fur		ft² Heat in	put (see instruct	ions)				<u> </u>	Operation	g Parameters (inlu	ıde un			<u> </u>	<u> </u>
Fuel	Type of Tu		1041 111	Heat Input							e/Parameter	ue uil	1W)	Descript	ion	
a b c	NA NA					Maximum ( Design Car	Operating Roacity/Volur	e/Throughpu ate/Through ne		NA				,		
	Notes					Shell Heigh										
	1,000					Tank Diam	eter (ft) Fixed	d Boot	Flootie	ng Roof	External Flo	atin a	Beef (	Internal Flo	atina Daaf	
Fn	nission Point ID	) No				Δir Pol		ecific Info			C External Flo	aung	Rooi O	internai Fic	aung Root	
	(Alternate ID			1			ed Emissio				I					
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	316		Contro Equipm Code	ent Equipment	HAP/TAP CAS Number	Average (lb/hr)	Maximum (lb/hr)		Emis	ermitted ssion Rate tons/yr)	Add, Change, Delete, or Unchanged	Cor	ntinuous mpliance //ethod	Concentra	tion in Gase Stack	s Exiting at
	Pollutant					` '	<u> </u>		·		D					
	PM <sub>10</sub> SO <sub>2</sub>			<u> </u>						0.001	<u>D</u>					
	NOx							<del>                                     </del>								
	CO															
	VOC Total		000		400.04.0	<0.001	0.004	<0.01			A					
	Hydroquinon	е	000		123-31-9	<0.001	0.004	<0.01			Α	:				
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					Emissions	Inventory	/ Questio	nnaire (E	IQ) for Ai	ir Poi	llutants			February	2010
Ei	mission Point II (Alternate ID			Descrip	tive Name of the Er	missions So	urce (Alt. Na	ime)			Approximate Locati	on of Stack or	Vent (see i	nstructions)	
	317	,							Metho	od Zone	N/A 15 Horizontal 6	73,555 mE	Datum Vertical		D 83 008 mN
TEM	PO Subject Iter		Vac	cuum Clean-	Up Packaging E	Baghouse	Y-760X (	P&I.D. F7	03)   Latitu	iqe	30 degrees 3		sec 3	hundredths	3
	EQT0116								Longi	ituue .	uegreesr			-	
F Cha	ind Discharge Physical racteristics	Diamete Stack Discl Area	harge	Height of Stac Above Grade		Stack Gas at Conditi not at Star	ions, Star	ck Gas Exit mperature	Norma Operating (hours per	Time	Date of Constructio or Modification	n Percen Jan - Mar	This Emi	Throughput ssion Point Jul - Sep	
C	hange? No	1.00	ft ft²	60 ft	7.64 ft/sec	360	ft³/min Ar	nbient °F	8760	١	1995	25%	25%	25%	25%
			Heat I	nput (see instr					Ор		g Parameters (inlude	units)		,	•
Fuel		of Fuel		Heat Inp	it (MM Btu/hr)	1		CT-1			/Parameter		Descrip	tion	
a b c		IA				Maximum (		e/Throughpu ate/Through ne		NΑ					
	Notes					Shell Heigh							***************************************		
	Notes					Tank Diam								,	
							O Fixed	Roof O	Floating Ro	oof	<ul><li>External Floati</li></ul>	ng Roof 🔘	Internal Flo	oating Roof	
E	mission Point II					Air Po	llutant Sp	ecific Info	mation						
	(Alternate ID	9)	Cont	trol Control		Propos	sed Emissio	n Rates	Permitte	ed	Add, Change,	Continuous			
	317		Equip	ment Equipme		Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	Emission I	Rate	,	Compliance Method	Concentra	ition in Gase Stack	es Exiting at
	Pollutant		0.4	7 00.00/				` ' '	, ,		_				
	PM <sub>10</sub> SO <sub>2</sub>		01	7 99.9%		<0.001	0.40	<0.01	5.53		С				
	NOx		-												
	CO		<del> </del>			1									
	VOC Total	• •													
	Hydroquinor	ne	01		132-31-9	<0.001	0.32	<0.01			Α				
	Pyrocatecho	ol .	01	7 99.9%	120-80-9	<0.001	0.08	<0.01			Α				
						•									
<u> </u>					+										
						<u> </u>									-
						***************************************									
						<del> </del>		<u></u>					-		
					1										

								State of	Louisiana	3						Date of Sub	mittal
						<b>Emissions</b>	Inventory	/ Questic	nnaire (E	IQ) f	or Air Po	llutants				February 2	2010
	Em	nission Point ID (Alternate ID			Descriptiv	re Name of the En	nissions Sol	urce (Alt. Na	ame)	·	******	Approximate Lo	cation	of Stack or	Vent (see ir	nstructions)	*****
		F-6C									Method		/A		Datum	***************************************	O 83
Ti	EMF	O Subject Iten	n ID No.			Cathy Fugitiv	/e Emissi	ons			UTM Zone Latitude	15 Horizontal 30 degrees		,544 mE min 41	Vertical	3,376,80 hundredths	
		FUG4									Longitude	91 degrees		min 29		hundredths	
	Pl	•	Diameter Stack Disch	arge He	ight of Stack bove Grade	Stack Exit Velocity	Stack Gas at Conditi	ons, Sta	ck Gas Exit mperature	Oper	Normal ating Time	Date of Construe		Percent		Throughput t	hrough
(		acteristics nange?	Area NA	<sub>ft</sub>		•	not at Star	luaro		-	's per year)	or mounically	,,,	Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
		Change? NA ft No ft² Type of Fuel Used and He Type of Fuel NA		ft²	NA ft	NA ft/sec	NA	ft³/min Ar	nbient °F		8760	NA		25%	25%	25%	25%
Fuel				Heat Inpu								g Parameters (inlu	ıde ur	nits)	····	***************************************	
Fuel a					Heat Input	(MM Btu/hr)	Named On	ti D-4				/Parameter			Descript	ion	
b c		NA Notes						Operating R	e/Throughpu ate/Through		NA						
				Notes			Shell Heigh		110								
							Tank Diam										
								O Fixe	Roof O	Floati	ng Roof	O External Fig	pating	Roof O	Internal Flo	ating Roof	
	Em	nission Point ID							ecific Infor	matic	วท			*****	****		
		(Alternate ID)	)	Control	Control		Propos	ed Emissio	n Rates	P,	ermitted	Add, Change,	<u></u>	ntinuous	***************************************	•	********
		F-6C		Equipmen Code		HAP/TAP CAS Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	Emis	ssion Rate ons/yr)	Delete, or Unchanged	Co	mpliance Vethod	Concentra	tion in Gase: Stack	s Exiting at
	į	Pollutant					(15/117)	(10/11/)	(101107317	1,	Olio/y/)	Orienangea		VIEUTOG	·		
		PM <sub>10</sub> SO <sub>2</sub>													·······	to.	
		NOx						 							<u></u>		
		CO							1.							***************************************	
		VOC Total		000			0.26	NA	1.12		0.46	С					
		Phenol		000		108-95-2	0.06	NA	0.28		0.28	U					
	_	Hydroquinone		000		123-31-9	0.003	NA	0.01		0.01	U					
		Pyrocatechol	l	000		120-80-9	0.003	NA	0.01		0.01	U					
									1			·*************************************					
							******	ļ	ļ								
		****															
				****	<del>                                     </del>		***************************************					***************************************					
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								State of	Louisian	a					т-	D.1 (0.1	
						Emissions	Inventor				ina Ataba	D-44-				Date of Sub	
	En	nission Point II	D No		Description	Emissions	mireintor	y Questi	onnaire (E	ו (גוו:	OF AIT PO	llutants				February	2010
		(Alternate ID			Descripti	ve Name of the Er	Tissions So	ource (Alt. N	iame)			Approximate Lo	cation	of Stack or	Vent (see i	nstructions)	
		F-6D									Method		l/A		Datum	l NA	D 83
T	ЕМЕ	O Subject Iter	m ID No.			Daphne Fugi	tive Emis	sions			UTM Zone				Vertica		
		FUG5									Latitude Longitude	30 degrees 91 degrees				hundredths	
		~	-								Longitude	_ <del>91</del> degrees	11	min <u>27</u>	.sec2_	hundredths	3
Sta		nd Discharge	Diameter		ight of Stack	Stack Exit	Stack Gas	Flow Sta	ick Gas Exit		Normal	Data of County	- 67 -	Percent	t of Annual	Throughput 1	through
(		hysical acteristics	Stack Disch Area		ove Grade	Velocity	at Condit	ions, Ta	emperature		rating Time	Date of Constru or Modification				ssion Point	oogi
		nange?	NA.	ft			not at Sta	ndard	•	(hou	rs per year)	J. Woulingatio	<b>41</b>	Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
		No		ft²	NA ft	NA ft/sec	NA	A ft³/min A	mbient °F		8760	NA		25%	25%	25%	25%
Fire	1	Type of Fu	el Used and	Heat Inpu	t (see instruc					<u> </u>	Operatin	g Parameters (inlu	ıde un	its)	<u> </u>		<u></u>
Fuel a	-		of Fuel		Heat Input	(MM Btu/hr)					Value	e/Parameter			Descrip	tion	
b		IN.	NA						e/Throughpu		NA						
С				1			Design Ca	Operating F pacity/Volu	Rate/Through	put							
				Notes			Shell Heigh	ht (ft)	116								
							Tank Diam										
								O Fixe	d Roof	Floati	ng Roof	O External Fig	ating	Roof O	Internal Flo	ating Roof	
	Em	ission Point ID	4						ecific Infor	matio	on	****		···			** <u>**</u>
		(Alternate ID)	' <b> </b>	Control	Control		Propos	sed Emissio	n Rates	Pí	ermitted	Add, Change,		_1!		<del>****</del>	****
		F-6D	ŀ	Equipment	Equipment	HAP/TAP CAS Number	Average	Maximum	Annual		ssion Rate	Delete, or		ntinuous npliance	Concentra	tion in Gases	s Exiting at
		Pollutant	·	Code	Efficiency	r varriber	(lb/hr)	(lb/hr)	(tons/yr)		ons/yr)	Unchanged		1ethod		Stack	
		PM <sub>10</sub>															
		SO₂									*		<del></del>		···		
		NOx CO			<u> </u>												
		VOC Total		000			0.12	NIA.	0.50						******		
		Hydroquinone	9	000		123-31-9	0.13 0.001	NA NA	0.59 0.01		0.59	U					
		Pyrocatechol		000		120-80-9	0.01	NA NA	0.03		0.01	U					
		Methyl chlorid		000		74-87-3	0.05	NA	0.23		0.24	<del>c</del>					
		Ethyl chloride	)	000		75-00-3	0.03	NA	0.12		0.12	U	***		····	****	
			<del></del>						<del>                                     </del>								
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		****					1.01	***	<del>                                     </del>				****				
45.00	7 00	NO Arr						<u> </u>	<u> </u>						****		

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									Louisiana							Date of Sub	omittal
						Emissions	•		-	IQ) f	or Air Po	llutants				February	2010
	En	nission Point II (Alternate ID			Descriptiv	e Name of the Er	nissions Sou	ırce (Alt. Na	ame)			Approximate Loc	cation	of Stack or	Vent (see i	nstructions)	
		F-6V									Method UTM Zone	N. 15 Horizontal	/A	662E	Datum Vertica		D 83
Т	EMF	PO Subject Iter FUG1	n ID No.			Vanessa Fugi	tive Emiss	sions			Latitude	30 degrees	30		sec 1	hundredths	;
1	Pi Char	acteristics	Diamete Stack Discl Area	harge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi- not at Star	ons, Sta	ck Gas Exit mperature	Oper	Normal rating Time rs per year)	Date of Construction or Modification		Percent Jan - Mar		Throughput ssion Point Jul - Sep	
	CI	nange? No	NA	ft²	NA ft	NA ft/sec	NA	ft³/min Ar	nbient °F		8760	NA		25%	25%	25%	25%
L				Heat	Input (see instruc						Operatin	g Parameters (inlu	ıde un	its)		· · · · · · · · · · · · · · · · · · ·	
Fuel	4	Type o			Heat Input (	(MM Btu/hr)						/Parameter			Descrip	tion	
b c		N					Maximum ( Design Car	Operating Roacity/Volur	e/Throughpu ate/Through ne		NA						,
				Notes			Shell Heigh										
							Tank Diam						L				
							<u> </u>	O Fixe			ing Roof	O External Flo	pating	Roof 🔾	Internal Flo	oating Roof	
	En	nission Point IE							ecific Infor	matic	on						
		(Alternate ID	)	Con Equip Co	ment Equipment	HAP/TAP CAS Number	Average	Maximum	Annual	Emis	ermitted ssion Rate	Add, Change, Delete, or	Cor	ntinuous npliance	Concentra	ition in Gase Stack	es Exiting at
		Pollutant		Col	ue Elliciency		(lb/hr)	(lb/hr)	(tons/yr)	(1	tons/yr)	Unchanged	N	1ethod			
-		PM <sub>10</sub>							ļ								
		SO₂ NOx															
$\vdash$		CO							1			4***					
		VOC Total		00	00		0.11	NA	0.46		0.46	U					
		Methanol		00	00	67-56-1	0.04	NA	0.18		0.23	С					
	Me	thyl isobutyl k	etone	00	00	108-10-1	0.06	NA	0.28		0.23	С					
		***************************************															
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		***************************************							<del> </del>								
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								State of I	Louisiana							Date of Sub	mittal
						Emissions	inventory	Questio	nnaire (E	IQ) f	or Air Pol	lutants				February :	2010
	Er	nission Point ID (Alternate ID)			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. Na	ıme)			Approximate Loc	cation	of Stack or V	Vent (see ir	nstructions)	
		` M-5	,								Method UTM Zone	Na 15 Horizontal	/A 673	,475 mE	Datum Vertical	NAI 3,376,7	0 83 86 mN
TI	ЕМ	O Subject Iten	n ID No.			Cooling	Towers				Latitude	30 degrees	***************************************	min 39	sec 3	hundredths	
		EQT0126									Longitude	91 degrees	11	min <u>31</u>	sec 8	hundredths	
Stac		nd Discharge hysical	Diameter Stack Disch	arge Hei	ght of Stack	Stack Exit	Stack Gas at Condition	nne   Stat	k Gas Exit		Normal rating Time	Date of Construc		Percent		Throughput i ssion Point	through
C	Char	acteristics	Area		ove Grade	Velocity	not at Star	idard le	mperature	(hou	rs per year)	or Modificatio	n	Jan - Mar	Apr - Jun		Oct - Dec
	U	hange? No	NA	ft ft²	NA ft	NA ft/sec	NA	ft³/min Ar	nbient °F		8760	NA		25%	25%	25%	25%
	$\blacksquare$			Heat Input	t (see instruc							g Parameters (inΙι	ıde ur	nits)			
Fuel	$\perp$	Type o			Heat Input (	(MM Btu/hr)			— ·			/Parameter			Descrip	tion	
a b c		IN.	NA Notes					Operating R	e/Throughpu ate/Through		NA						
J	_	Notes				:	Shell Heigh		10								
***************************************			Notes				Tank Diam	eter (ft)					_				
								O Fixed			ing Roof	O External Flo	oating	Roof O	Internal Flo	ating Roof	
	Er	nission Point IE							ecific Infor	mati	on						
		(Alternate ID	)	Control	Control		Propos	ed Emissio	n Rates	P	ermitted	Add, Change,	Co	ntinuous	١ .		. <b>F</b> . 20
		M-5		Equipment	Equipment	HAP/TAP CAS Number	Average	Maximum	Annual		ssion Rate	Delete, or		mpliance	Concentra	tion in Gase Stack	s Exiting at
		Pollutant		Code	Efficiency		(lb/hr)	(lb/hr)	(tons/yr)	(1	tons/yr)	Unchanged	[	Method			
		PM <sub>10</sub>		000			4.24	NA	18.57		0.17	С					
		SO₂															
		NOx CO			1												
		VOC Total									. !						
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							State of	Louisiana	1					Date of Su	bmittal
					Emissions	Inventory	Questic	nnaire (E	IQ) f	or Air Po	llutants			February	2010
Eı	nission Point ID (Alternate ID			Descriptiv	e Name of the En	nissions Sou	urce (Alt. Na	ame)			Approximate Loca	tion of Stack	or Vent (se	e instructions)	
	M-6	,								Method	N/A				D 83
TEM	PO Subject Iten	n ID No.			Cathyva	I Sumps				Latitude		30 min 40	) sec	9 hundredth	s
	EQT0126									Longitude	91 degrees	11 min 2	_sec _	8 hundredth	s
F Cha	racteristics	Diameter Stack Disch Area	harge	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Sta	ck Gas Exit mperature	Oper	Normal rating Time rs per year)	Date of Construct or Modification	ion	This E	ual Throughput Emission Point Iun   Jul - Sep	through Oct - Dec
	hange? No	NA	ft²	NA ft	NA ft/sec	NA	ft³/min Ar	nbient °F		8760	NA	25%	25%	25%	25%
			Heat I	Input (see instruc							g Parameters (inlud	le units)		***************************************	
Fuel	Type o			Heat Input	(MM Btu/hr)						/Parameter		Desc	cription	
a b c	N	А					Operating R	e/Throughpu ate/Through ne		NA					
	Notes					Shell Heigh									
***************************************	Notes					Tank Diam									
							O Fixe	Roof O	Floati	ing Roof	O External Floa	ating Roof (	Internal	Floating Roof	
E	mission Point II	No.				Air Pol	llutant Sp	ecific Info	matic	on					
	(Alternate ID	)	C+++	tant Constant		Propos	sed Emissic	n Rates	Ь	ermitted	Add, Change,	Continuous			
	M-6		Cont Equipa Cod	ment Equipment	HAP/TAP CAS Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	Emis	ssion Rate tons/yr)	Delete, or Unchanged	Compliance Method	Conce	ntration in Gas Stack	es Exiting at
	Pollutant PM <sub>10</sub>					` ′		ļ · · · · ·	<u> </u>		-				
	SO <sub>2</sub>							1							
	NOx							<u> </u>	<b></b>						
	CO														
	VOC Total		00	00		0.005	NA	0.02		0.02	U				
	Pyrocatecho	)								0.001	D				
	Phenol		00	10	108-95-2	<0.001	NA	<0.01		<0.001	C D		-		
	Hydroquinon ethyl isobutyl k		00	<del>10</del>	108-10-1	<0.001	NA	<0.01		<0.001 0.002	U				
IVI	GITIYI ISODULYI K	erone	00	,0	100-10-1	\0.001	I INA	₹0.01		0.002					
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					Emissions I	nventory	Questio	nnaire (E	IQ) fo	or Air Pol	lutants				February 2	2010
	Emission Point IC			Descriptive	Name of the Em	nissions Sou	rce (Alt. Na	me)			Approximate Loc	ation of	Stack or \	Vent (see in	structions)	
	(Alternate ID	,								Method	N/.		11	Datum	NAI 3,376,9	0 83
				Emissions	s Cap - Waste	water Tre	atment F	lant		UTM Zone	15 Horizontal 30 degrees	30 m		Vertical	5,376,9 hundredths	
TE	MPO Subject Iter				•				İ	Latitude Longitude		11 m			hundredths	
	GRP014											<u></u> ''				
Stack	and Discharge	Diameter	IHE	ight of Stack	Stack Exit	Stack Gas at Condition	1 5100	ck Gas Exit		Normal ating Time	Date of Construc	tion	Percent		Throughput t sion Point	nrougn
	Physical	Stack Disch Area	ISTORI	bove Grade	Velocity	not at Stan		mperature		rs per year)	or Modification	n	Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
, cr	naracteristics Change?	NA	<u>.</u>			not at otan			·			F				
	No.		ft²	20 ft	NA ft/sec	NA	ft³/min Ar	nbient °F		8760	NA		25%	25%	25%	25%
	Type of Fu	el Used and	Heat Inpu	ut (see instructi							g Parameters (inlu	de units	3)			
Fuel		of Fuel		Heat Input (I	MM Btu/hr)						/Parameter			Descript	ion	
a	N	IA						e/Throughpu		NA						
b								ate/Through	put							
С		Notes					acity/Volur	ne		····						
<u> </u>			Notes			Shell Heigh Tank Diam										
								Roof O	Floori	ing Poof	O External Flo	ating P	oof O	Internal Flo	ating Roof	
				·····		Air Dal					CLAternaria	aung i		internal i te	dang root	
	Emission Point II (Alternate ID					All Pol	ed Emissic	ecific Info	mau	OII	I					
	,	"	Control	Control	HAP/TAP CAS	Propos				ermitted	Add, Change,		tinuous	Concentra	tion in Gase	s Exiting at
	WWT		Equipment Code	t Equipment Efficiency	Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	ŧ .	ssion Rate tons/yr)	Delete, or Unchanged		pliance ethod		Stack	
	Pollutant					`		1								
	PM <sub>10</sub>								-							
	SO₂ NOx								<del>                                     </del>							
	CO			+ +						**********						
<b></b>	VOC Total		000			4.01	NA	17.55		15.28	С					
	Hydroquinor									<0.001	D					
	Pyrocatecho	ol	000		120-80-9	0.01	NA	0.05		0.04	С					
	Phenol		000		108-95-2	0.01	NA	0.03		0.02	С					
	Methanol		000		67-56-1	0.72	NA	3.16		3.25	C					
	Methyl isobutyl k	retone	000		108-10-1	1.74	NA	7.63		7.31	C					
						<u> </u>	-		+			<del>                                     </del>	<del>~-</del>			
-								<del> </del>	+-							
$\vdash$						-	-	<b></b>	•			······	W-44474			
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<b>—</b>			<del>                                     </del>		l <del>une:</del>											
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# SECTION 6.0 EMISSION CALCULATIONS

Unit:

Vanessa

EIQ I.D.:

101

Description:

Lights Tank Farm Scrubber C-165

### Sources Venting to Scrubber

MIBK and methanol storage tanks, estimate using Tanks Program Loading of Vanessa tars into trucks, estimate using AP-42 Loading Loss equation

Tanks Program Inputs:	D-148	D-149	D-152	D-153	D-169
contents	MIBK	MIBK	MIBK	MIBK	methanol
Type of Tank	vertical	vertical	horizontal	horizontal	vertical
shell height/length (ft)	12	12	24	24	15
shell diameter (ft)	10.5	10.5	10	10	10.5
maximum liquid height (ft)	11.75	11.75			14.75
average liquid height (ft)	6.0	6.0			7.0
Volume (gals)	8,200	8,200	14,600	14,600	10,350
Turnovers per year	675.61	675.61	660.96	660.96	490.82
Net Throughput (gals/yr) <sup>1</sup>	5,540,000	5,540,000	9,650,000	9,650,000	5,080,000
Is Tank Heated?	$N^2$	N <sup>2</sup>	N <sup>2</sup>	N <sup>2</sup>	N
roof color/shade	aluminum/specular	aluminum/specular			aluminum/specular
roof condition	good	good			good
roof type (cone or dome)	dome	dome			dome
height of cone/dome	1.42	1.42			1.5
slope of cone roof (ft/ft) or radius (ft) of dome roof	10.5	10.5			10.5
shell color/shade	aluminum/specular	aluminum/specular	aluminum/specular	aluminum/specular	aluminum/specular
shell condition	good	good	good	good	good
vacuum settings (psig) <sup>3</sup>	-0.5	-0.5	-0.5	-0.5	-0.5
pressure settings (psig) <sup>3</sup>	0.5	0.5	0.5	0.5	0.5
Tanks Program Outputs:					
Annual Emissions, pre-scrubber, lbs/yr	909.06	909.06	1590.86	1590.86	1974.16

<sup>&</sup>lt;sup>1</sup> The annual throughput of Tanks 148 and 149 is capped at 11,080,000 gal/yr and the annual throughput of Tanks 152 and 153 is capped at 19,300,000 gal/yr. The annual throughput listed here for each tank is an average used to calculate permitted emission rates and is not intended to set a permit limit on the annual throughput of each tank. Since the tanks are identical, emissions will be the same regardless of which tank is used.

<sup>&</sup>lt;sup>2</sup> Material entering tank is at elevated temperature, however tank is eqiupped with a cooler. Temperature ranges from 45-95 °F with typical summer high about 85 °F. Emissions are expected to be less than if the tank operated at ambient temperature with no cooler. Thus, ambient will be assumed for the Tanks program.

<sup>&</sup>lt;sup>3</sup> Actual difference between pressure and vaccuum vent settings is >1 psig, max pressure difference allowed by Tanks is 1 psig (0.5 psig for each).

#### Loading Emissions - Pre-Scrubber

	Vanessa
	tars
Temperature of bulk liquid loaded, F	185
Temperature of bulk liquid loaded, R	645
Temperature of bulk liquid loaded, K.	614
P (psia), vapor pressure, assume guaiacol properties <sup>9</sup>	0.2159
M, molecular weight	124.14
S, saturation factor	1.45
L <sub>L</sub> loading loss, lbs per 1000 gals loaded <sup>8</sup>	0.751
Annual Amount Loaded, gals	250,000
Annual Pre-controlled Emissions, lbs/yr	187.7

-		
£ '	hoices	OTO:

submerged fill, clean container submerged fill, dedicated service submerged fill, vapor balance splash, clean or dedicated splash, vapor balance 0.50

0.60 1.00 1.45 1.00

# Estimate Emissions During Plant Outage with no Scrubber Water Flow (Breathing Losses from Vessels)

Duration:

0 Da

Tank	contents	Highest Monthly Breathing Loss (lbs/mo) <sup>11</sup>	Outage Breathing Loss (lbs)
1 ank	COMENS		`
D-148	MIBK	1.27	0.42
D-149	MIBK	1.27	0.42
D-152	MIBK	2.7	0.90
D-153	MIBK	2.7	0.90
D-169	MeOH	14.14	4.71

<sup>&</sup>lt;sup>11</sup>Per Tanks 4.0 program, same inputs as above, June is worst month for breathing losses.

## TOTAL EMISSIONS

	Pre-Control	Pre-Control Emissions		Control Outage		Emissions for EIQ Form	
	Storage Tanks lbs/yr	Loading lbs/yr	Efficiency	lbs/yr	Average lbs/hr	Annual TPY	
MIBK	4999.840		93.8%	2.65	0.036	0.156	
methanol	1974.160		99.9%	4.71	0.001	0.003	
guaiacol		187.684	99.0%			0.001	
total VOCs					0.037	0.161	

<sup>&</sup>lt;sup>8</sup>Per AP-42, Section 5-2, Transportation and Marketing of Petroleum Liquids, 1/95, Equation 1, L<sub>L</sub> = 12.46 SPM/T (T in degrees R, P in psia)

<sup>&</sup>lt;sup>9</sup> The truck used to transport Vanessa tars is also used to transport Daphne tars and may contain phenol and/or pyrocatechol in the vapor space. Similarly, when emissions from loading Daphne tars are vented to scrubber C-146, the vapors may contain MIBK from a previous load of Vanessa tars. When the emissions from the two scrubbers are considered in aggregate, the net effect is negligible and is thus not addressed in the emission calculations.

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

**Cathyval Plant** 

Unit:

Vanessa

EIQ I.D.:

102

Description:

Heavies Tank Farm Scrubber C-187

# Sources Venting to Scrubber

guaiacol storage tank, D-107 guetol storage tank, D-111 glyoxylic acid (50% aqueous) storage tank, D-113, negligible emissions guaiacol loading guetol loading PMP loading

Tanks Program Inputs:	D-107	D-111
contents	guaiacol	guetol
Type of Tank	vertical	vertical
shell height/length (ft)	24	24
shell diameter (ft)	18	15
maximum liquid height (ft)	24	24
average liquid height (ft)	12	12
Volume (gals)	45,000	31,700
Turnovers per year	37.24	49.65
Net Throughput (gals/yr)	1,676,000	1,574,000
Is Tank Heated?	$Y^2$	$Y^2$
For heated tanks, avg liquid surface temp	180	190
For heated tanks, min liquid surface temp	180	190
For heated tanks, max liquid surface temp	180	190
For heated tanks, bulk liquid surface temp	180	190
roof color/shade	aluminum/specular	aluminum/specular
roof condition	good	good
roof type (cone or dome)	cone	cone
height of cone/dome	0	0
slope of cone roof (ft/ft) or radius (ft) of dome roof	0.27	0.27
shell color/shade	aluminum/specular	aluminum/specular
shell condition	good	good
vacuum settings (psig) <sup>3</sup>	0.000	0.000
pressure settings (psig) <sup>3</sup>	0.000	0.000
Tanks Program Outputs:		
Annual Emissions, pre-scrubber, lbs/yr	902.38	701.59

<sup>&</sup>lt;sup>2</sup> For tanks heated above 100F, the vapor pressure at the elevated temperature was entered for Option 1. Per Tanks program manual, the program will select this value for temps over 100F as long as Option 2 is blank.

<sup>&</sup>lt;sup>3</sup> Req'd to be zero for constant temperature tanks.

# Loading Emissions - Pre-Scrubber

	Guaiacol	Guetol	PMP
Temperature of bulk liquid loaded, F	110	120	225
Temperature of bulk liquid loaded, R	570	580	685
Temperature of bulk liquid loaded, K	316	322	380
P (psia), vapor pressure	0.018	0.023	0.098
M, molecular weight	124.14	138.17	124.14
S, saturation factor <sup>7</sup>	0.5	0.5	0.5
L <sub>L</sub> loading loss, lbs per 1000 gals loaded <sup>8</sup>	0.025	0.034	0.110
Annual Amount Loaded, gals	400,000	300,000	77,000
Annual Pre-controlled Emissions, lbs/yr	9.95	10.24	8.48

<sup>7</sup> Choices are:	submerged fill, clean container	0.50
	submerged fill, dedicated service	0.60
	submerged fill, vapor balance	1.00
	splash, clean or dedicated	1.45
	splash, vapor balance	1.00

 $<sup>^8</sup> Per~AP-42,~Section~5-2,~Transportation~and~Marketing~of~Petroleum~Liquids~,~1/95,~Equation~1,~L_L=12.46~SPM/T~(T~in~degrees~R,~P~in~psia)$ 

## TOTAL EMISSIONS

	Pre-Control	Emissions	Control	Emissions for EIQ For	
	Storage Tanks lbs/yr	Loading lbs/yr	Efficiency	Average Ibs/hr	Annual TPY
guaiacol	902.380	9.955	99.20%		0.004
guetol	701.590	10.245	99.20%		0.003
PMP		8.48	99.20%		0.000
total VOCs				0.001	0.007

Unit:

Vanessa

EIQ I.D.:

103

Description:

Condensation Vent Scrubber C-201

Pollutant	Removal Efficiency <sup>1</sup> (%)	Feed to Scrubber <sup>1</sup> (lbs/hr)	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions <sup>2</sup> (lbs/hr)	Annual Emissions (tpy)
Guaiacol	99.7%	0.636	0.002	0.004	0.008
Veratrole	98.1%	0.456	0.009	0.017	0.038
Total VOC			0.011	0.021	0.046

 $<sup>^{1}\,</sup>$  Cathyval Project Vanessa Vent Scrubbers Design Summary, 5/23/89, added 20% safety factor.

<sup>&</sup>lt;sup>2</sup> Maximum assumed to be twice the average.

Unit:

Vanessa

EIQ I.D.:

104

Description:

Solvent 1 Vent Scrubber C-248

Pollutant	Removal Efficiency (%)	Average Feed to Scrubber <sup>1</sup> (lbs/hr)	Maximum Feed to Scrubber <sup>1</sup> (lbs/hr)	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
MIBK	98.7%	2.10	2.10	0.027	0.027	0.120
other VOC	99.9%	0.005	2.56	0.000	0.003	0.000
Total VOC				0.027	0.030	0.120

<sup>&</sup>lt;sup>1</sup> Cathyval Project Vanessa Vent Scrubbers Design Summary, 5/23/89, added 20% safety factor.

Unit:

Vanessa

EIQ I.D.:

106

Description:

Vanillin Extraction Scrubber C-427

Pollutant	Removal Efficiency <sup>2</sup> (%)	Average Hourly Emissions <sup>1</sup> (lbs/hr)	Maximum Hourly Emissions <sup>3</sup> (lbs/hr)	Annual Emissions (tpy)
MIBK	98.0%	0.21	0.82	0.90
Total VOC		0.21	0.82	0.90

 $<sup>^1</sup>$  Based on testing conducted July 2007 to determine emissions impact of VMAX project. Used 5 times the max test result as conservative estimate.

 $<sup>^2</sup>$  There is a condenser upstream of this scrubber. This represents efficiency of condenser and scrubber in series.

<sup>&</sup>lt;sup>3</sup> Conservatively assumed to be four times the average.

Unit:

Vanessa

EIQ I.D.:

107

Description:

**Distillation Scrubber C-557** 

	-	Average	Maximum	Maximum	
	Removal	Hourly	Hourly	Hourly	Annual
	Efficiency	Emissions <sup>1</sup>	Emissions <sup>2</sup>	Duration <sup>3</sup>	Emissions
Pollutant	(%)	(lbs/hr)	(lbs/hr)	(hrs/yr)	(tpy)
MIBK	99.2%	< 0.001	0.100	150	0.01
Total VOC	99.9%	< 0.001	0.100		0.01

<sup>&</sup>lt;sup>1</sup> Stack test conducted by Weston on 11-20-2008.

<sup>&</sup>lt;sup>2</sup> Intermittant line-clearing operations.

<sup>&</sup>lt;sup>3</sup> Assumes maximum occurs for 150 hours per year.

Unit:

Vanessa

EIQ I.D.:

108

Description:

Crystallization Scrubber C-624

Pollutant	Removal Efficiency (%)	Average Feed to Scrubber <sup>1</sup> (lbs/hr)	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Methanol	99.9%	1.806876	0.002	0.002	0.008
other VOC	99.8%	0.0024	0.000	0.000	0.000
Total VOC			0.002	0.002	0.008

 $<sup>^1\,</sup>$  Cathyval Project Vanessa Vent Scrubbers Design Summary, 5/23/89, added 20% safety factor.

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

**Cathyval Plant** 

Unit:

Vanessa

EIQ I.D.:

109

Description:

Baghouse Filter Scrubber C-704

Operating Time =
Gas flow =

8760 hrs/yr

Particulate conc (inlet) =

7400 ACFM 10 ppm

Molecular weight of air =

29

Molar volume at 77F (avg temp) =

392 ft<sup>3</sup>/lbmole

Removal Efficiency =

95%

Emissions (outlet) =

0.0164 lbs/hr

	Average	Maximum	
	Hourly	Hourly	Annual
	Emissions	Emissions	Emissions
	(lbs/hr)	(lbs/hr)	(tpy)
PM10	0.02	0.03	0.07

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana Cathyval Plant

Unit:

Cathy .

EIQ I.D.:

110

**Description:** 

High Purity PC Mixing Vessel

#### Basis/Steps

- 1. Solvent (DMSO) arrives in a trailer and is unloaded into the mixing vessel. There are no emissions from this step because pressure is allowed to build in the mixing vessel and associated piping to accommodate the volume of solvent. This has been verified in actual operation (the pressure control valve does not open.)
- 2. Molten PC at 300 F is then slowly added to the mixing vessel. The mixing vessel is equipped with an agitator and external cooling to keep the temperature at or below 130 F. The pressure control vent does open and vent to atmosphere during the mixing step. Time for mixing is one hour or less.
- 3. After mixing, the PC/solvent mixture is transferred into trailers for offiste shipment. Three batches will be made to load each trailer. Mixture loading will vent to atmosphere. Loading is complete in one hour or less. Temperature has cooled to 100 F or less before loading.
- 4. Fugitive emissions were calculated to be 0.0001 TPY which is negligible in this case.

## Operating Hours (used only for calculating average emissions, not annual or max)

Hours per Day	6
Days Per Week	1.1
Weeks Per Year	52

## **Input Data**

Total mixture sh	1000 MT/year	
Total mixture pe	6 MT	
Batches per trail	3	
Trailers per year		56
Mixing vessel vo	1900 gals	
Amount of PC a	350 gals	
Amount of DMS	1400 gals	
Initial temperatu	80 F	
Max temperature	130 F	
Pressure control	20 psig	
Loading rate into	150 gpm	
Loading tempera	ature	100 F
Saturation factor	, loading mixture into trailers <sup>1</sup>	0.6
<sup>T</sup> Choices are:	submerged fill, clean container	0.50
	submerged fill, dedicated service	0.60
	submerged fill, vapor balance	1.00
	splash, clean or dedicated	1.45
	splash, vapor balance	1.00

# Emissions from mixing step

Emissions occur due to vapor displacement from adding PC to the mixing vessel and due to vapor expansion from heat of mixing. Although these operations occur simultaneously, they will be treated separately in the emission calculation for simplicity.

Vapor displacement per batch from adding PC	350 gals
(assume equal to amount of PC added)	46.79 ft <sup>3</sup> @ Pcv
Volume of vapor space at initial temp (all inside vessel)	500 gals
	66.8 ft <sup>3</sup> @ Pcv
Volume of vapor at final temp (inside+outside vessel)	73.0 ft <sup>3</sup> @ Pcv
Volume displaced from temp increase	6.2 ft <sup>3</sup> @ Pcv
Total volume displaced (PC addition + temp increase)	52.98 ft <sup>3</sup> @ Pcv
Molar volume at final temp and Pcv (from ideal gas law)	183 ft3/lbmole
Total moles displaced	0.29029 lbmoles
•	
Pvap of DMSO @ final temp <sup>2</sup>	0.00537 bar
	0.00530 atm
Ptotal (Pcv)	2.36054 atm
Vapor mole fraction of DMSO	0.00224
DMCO disulated now botch	0.00065 lbmoles
DMSO displaced per batch	0.05091 lbs
	0.05071 108
PC per batch	0.00069 lbs
(assuming ratio of PC to DMSO from physical property spreadsheet)	

<sup>&</sup>lt;sup>2</sup> From physical property spreadsheet by Marc LeGros.

#### Loading into trailers

Estimate emissions using AP-42 for loading.

AP-42 loading loss equation:

 $L_L = 12.46 \text{ SPvapM/T}$ 

Where:

"S" is the saturation factor

"Pvap" is the true vapor pressure of liquid loaded, psia

"M" is the molecular weight of vapors

"T" is the temperature of the bulk liquid loaded, R

" $L_L$ " is the loading emissions, lbs per 1000 gal liquid loaded

To be conservative, use DMSO vapor pressure to represent mixture vapor pressure

S =	0.6
Pvap (bars)	0.00218
Pvap (psia)	0.032
M	78.135
$L_{L}$	0.033
1000 Gallons loaded per batch =	1.75
Total emissions per batch =	0.058 lbs
PC emissions per batch =	0.001 lbs

(assume max of 2% PC based on process spreadsheet)

6-13

#### **Total Emissions**

	avg lbs/hr	max lbs/hr <sup>3</sup>	TPY
PC	0.001	0.001	0.0002
total VOC	0.054	0.058	0.009

<sup>&</sup>lt;sup>3</sup> Max emissions occur during loading

#### **Discharge Characteristics**

Discharge Diameter	1 0.083	inches feet
Discharge Area	0.005	ft <sup>2</sup>
Stack Gas Flowrate (assume loading gives max stack flow)	150 20.1	gpm acfm
Stack Gas Velocity	61.3	ft/sec

Unit:

Vanessa

EIQ I.D.:

111

Description:

**Oxidation Vent** 

	Average Hourly	Maximum Hourly	Annual
	Emissions <sup>1</sup>	Emissions <sup>1</sup>	Emissions <sup>1</sup>
Pollutant	(lbs/hr)	(lbs/hr)	(tpy)
MIBK	< 0.001	< 0.001	0.002
Methanol	0.001	0.001	0.006
Total VOC	0.018	0.018	0.079

<sup>&</sup>lt;sup>1</sup> As preliminary estimate, assume same as C-419 currently permitted emissions. Will be updated when stack test is complete.

Unit:

Daphne

EIQ I.D.:

201

Description:

Tank Farm Scrubber C-146

#### Sources that Vent to Scrubber:

PC storage tank, D-111
Veratrol storage tank, D-141
Cathy Tars storage tank, D-128 (assume 100% HQ for emission calcs)
Veratrole loading
PC loading
PDMB Loading
Daphne tars loading

Tanks Program Inputs:	D-111	D-141	D-128
contents	PC	veratrole	Cathy tars
Type of Tank	vertical	vertical	vertical
shell height/length (ft)	16	10	12
shell diameter (ft)	17.0	10	10
maximum liquid height (ft)	15	9	11
average liquid height (ft)	8	5	6
Volume (gals)	25,000	4,950	7,050
Turnovers per year	69.52	42.02	141.84
Net Throughput (gals/yr)	1,738,000	208,000	1,000,000
Is Tank Heated?	Y <sup>4</sup>	$\mathbf{Y}^4$	$Y^4$
For heated tanks, avg liquid surface temp	300	195	230
For heated tanks, min liquid surface temp	300	195	230
For heated tanks, max liquid surface temp	300	195	230
For heated tanks, bulk liquid surface temp	300	195	230
roof color/shade	aluminum/specular	aluminum/specular	aluminum/specular
roof condition	good	good	good
roof type (cone or dome)	cone	cone	сопе
height of cone/dome	0	0	0
slope of cone roof (ft/ft) or radius (ft) of dome roof	0.34	0.21	0.17
shell color/shade	aluminum/specular	aluminum/specular	aluminum/specular
shell condition	good	good	good
vacuum settings (psig) <sup>3</sup>	0.000	0.000	0.000
pressure settings (psig) <sup>3</sup>	0.000	0.000	0.000
Tanks Program Outputs:			
Annual Emissions, pre-scrubber, lbs/yr	1408.51	137.95	13.7

<sup>&</sup>lt;sup>3</sup> Pressure/vaccuum vent settings must be set to 0 for heated tanks.

<sup>&</sup>lt;sup>4</sup> For tanks heated above 100F, the vapor pressure at the elevated temperature was entered for Option 1. Per Tanks program manual, the program will select this value for temps over 100F as long as Option 2 is blank.

Loading - Pre-controlled Emissions

				Daphne tars
	PC	Veratrole	PDMB	$(PC)^3$
Temperature of bulk liquid loaded, F	275	170	180	320
Temperature of bulk liquid loaded, R	735	630	640	780
Temperature of bulk liquid loaded, K	408	350	355	433
P (psia), vapor pressure	0.401	0.115	0.107	4.25
M, molecular weight	110.11	138.17	138.17	124.139
S, saturation factor <sup>4</sup>	1.45	1.45	0.5	1.45
L <sub>L</sub> , loading loss, lbs per 1000 gals loaded <sup>5</sup>	1.086	0.458	0.144	12.226
Annual Amount Loaded, gals	186,000	190,000	25,000	103,000
Annual Pre-controlled Emissions, lbs/yr	202.1	86.9	3.6	1259.3

<sup>&</sup>lt;sup>3</sup> As conservative estimate, use properites of guaiacol (higher Pvap) to calculate emissions, then assume the emissions are PC (b/c PC is a HAP).

4 Choices are: submerged fill, clean container 0.50
submerged fill, dedicated service 0.60
submerged fill, vapor balance 1.00
splash, clean or dedicated 1.45
splash, vapor balance 1.00

#### TOTAL EMISSIONS

	Pre-Contro	l Emissions	Control	Emissions for EIQ Form		
	Storage Tanks Loading		Efficiency	Average	Annual	
	lbs/ут	lbs/ут		lbs/hr	TPY	
PC	1408.510	1461.320	98.0%	0.007	0.029	
HQ	13.700		98.0%	0.000	0.000	
other VOCs	137.950	90.528	98.0%		0.002	
total VOCs				0.007	0.031	

<sup>&</sup>lt;sup>5</sup> Per AP-42, Section 5-2, Transportation and Marketing of Petroleum Liquids , 1/95, Equation 1,  $L_L$  = 12.46 SPM/T (T in degrees R, P in psia)

Baton Rouge, East Baton Rouge Parish, Louisiana **Cathyval Plant** 

Unit:

Daphne

EIQ I.D.:

202

Description:

Vent Scrubber C-685

	Removal Efficiency	Average Hourly Emissions	Maximum Hourly Emissions	Annual Emissions	
Pollutant	(%)	(lbs/hr)	(lbs/hr)	(tpy)	Basis
Pyrocatechol	>98	0.005	0.048	0.02	1
Hydroquinone	>98	0.001	0.055	0.003	1
Methanol	>98	0.001	0.005	0.003	1
Phenol	>98	0.000	0.001	0.000	1
Total VOC <sup>2</sup>	>98	0.156	1.116	0.78	1

<sup>&</sup>lt;sup>1</sup> Add 20% safety factor to C. Bertrand calculations done for 1996 permit mod. <sup>2</sup> Does not equal sum of species listed due to presence of nonTAP VOCs.

Unit:

Cathy 301

EIQ I.D.: Description:

Phenolic Reactors Vent Scrubber C-209 (P&I.D. F201)

		Normal Operation1		Hot Wat	Hot Water Flush2		Overall Emissions		
							Average	Maximum	
	Removal						Hourly	Hourly	Annual
	Efficiency	Emissions		Emissions			Emissions	Emissions	Emissions
Pollutant	(%)	(lbs/hr)	Hrs/Yr	(lbs/hr)	Hrs/Yr	Lbs/Yr	(lbs/hr)	(lbs/hr)	(tpy)
Phenol	≥98	4.63E-05	8744	21	16	0.556	0.04	21	0.17
Pyrocatechol	≥99.9	4.63E-04	8744	2.7	16		0.01	2.7	0.024
Hydroquinone	≥53	6.53E-05	8744	0.3	16		0.001	0.30	0.003
Total VOC							0.04	24.0	0.19

#### Notes:

- 1 Based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used.
- 2 Uncontrolled emissions per design calcs
- 3 Scrubber Water Shut Off During Plant Outage:, nitrogen sweep shut off:

Basis: Upon shutdown and nitrogen sweep

Number of total heat-ups per year, (5 vessels, 10X each)	50	
Temp increase per event	10	F
Phenol MW	94.113	
Phenol freezing point	105.6	F
Assumed tank temp prior to heating	115.6	F
	575.6	R
	319.6	K
Vapor Pressure of Phenol at assumed temp	0.040	psia
Total pressure	14.7	psia
	1.00	atm
Mole fraction phenol, yi	0.00272	
Vapor Space Volume	8000	gals
Universal Gas Constant,R	0.7302	atm·ft3/lbmole·R
Total moles in vapor space prior to heating	2.5446	lbmoles
Total moles phenol in vapor space prior to heating	0.0069	lbmoles
Vapor Expansion Factor	1.017	
Phenol emitted per heat-up event	1.18E-04	lbmoles
	0.011	lbs
Total Emissions (assume all phenol)	0.556	lbs

Baton Rouge, East Baton Rouge Parish, Louisiana

Cathyval Plant

Unit:

Cathy

EIQ I.D.:
Description:

302 OSBL Tank Farm Scrubber C-319 (P&I.D. F107)

		Normal Operation <sup>4</sup>		Normal Operation <sup>4</sup> Hot Water Flush		Outage <sup>5</sup>		Overall Emissions			
									Average	Maximum	
									Hourly	Hourly	Annual
	Removal	Emissions			Emissions		Emissions		Emissions	Emissions	Emissions
	Efficiency (%)	(lbs/hr)	Basis	hrs/yr	(lbs/hr) <sup>3</sup>	Hrs/Yr	(lbs/hr)	hrs/yr	(lbs/hr)	(lbs/hr)	(tpy)
Phenol	≥98	3.17E-05	1	8744	2.54	16			0.005	2.54	0.02
Isopropyl Ether	≥98	0.022	2	8504	13.5	16	0.97	240	0.073	13.50	0.32
Total VOC									0.077	16.04	0.34

<sup>&</sup>lt;sup>1</sup> Based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used.

<sup>&</sup>lt;sup>2</sup> Based on stack testing conducted by G&M, Dec. 1996. The average emission rate is during R/C loading at normal scrubber flow rate.

<sup>&</sup>lt;sup>3</sup> Per design calcs Apx B, this is rate exiting condenser (normal inlet to scrubber).

<sup>&</sup>lt;sup>4</sup> This scenario also includes a planned plant outage where nitrogen sweep is off, condenser is off, and scrubber is on. These emissions are less than normal as estimated below.

<sup>&</sup>lt;sup>5</sup> This scenario is a planned plant outage where nitrogen sweep is off, condenser is off, and scrubber is off. These emissions are greater than normal (as estimated below) and must be included in annual limit.

Calculate Breathing Losses During Plant Outage with Nitrogen Sweep Off<sup>6</sup>:

Canoniace Dienaming Losses During Franc Outage with Milloge	D-315	D-107	D115
Tanks Program Inputs:			
contents	IPE	Water w/ trace IPE&Phenol (used 100% IPE as conservative estimate)	IPE
Type of Tank	Vertical	Vertical	Vertical
shell height (ft)	16	18	18
shell diameter (ft)	25	29	20
maximum liquid height (ft)	14.4	17.0	17.0
average liquid height (ft)	12.8	0.5	0.5
Volume (gals)	52,877	89,000	42,000
Turnovers per year	0	0	0
Net Throughput (gals/yr)	0	0	0
Is Tank Heated?	N	N	N
roof color/shade	white/white	white/white	white/white
roof condition	good	good	good
roof type (cone or dome)	cone	cone	cone
height of cone	0	0	0
slope of cone roof (ft/ft)	0.0625	0.0625	0.0625
shell color/shade <sup>3</sup>	white/white	white/white	white/white
shell condition	good	good	good
vacuum settings (inches H2O), this is N2 makeup setting	1	1	1
pressure settings (inches H2O), this is water depth in scrubber	10	10	10
vacuum settings (psig)	0.036	0.036	0.036
pressure settings (psig)	0.361	0.361	0.361
Tanks Program Outputs:			
Highest Monthly Emissions (June), lbs/mo	133.53	383.38	182.08
Additional Calcs:			***
Pre-scrubber average lbs/hr (for note 5 outage)	0.19	0.53	0.25
Scrubber Efficiency	98%	98%	98%
Post-scrubber average lbs/hr (for note 4 outage)	0.004	0.011	0.005

<sup>&</sup>lt;sup>6</sup> Assume zero breathing loss from the phenol tanks due to decreasing or constant temperature.

Baton Rouge, East Baton Rouge Parish, Louisiana Cathyval Plant

Unit:

Cathy

EIQ I.D.:

303

Description:

IPE Solvent Vent Scrubber C-402 (P&I.D. F402)

	Average Hourly	Max Hourly	Max Hourly	Annual
	Emissions <sup>I</sup> (lbs/hr)	Emissions <sup>2</sup> (lbs/hr)	Duration (hrs/yr)	Emissions (tpy)
Phenol	< 0.001	0.01	24	0.004
Isopropyl Ether	0.82	8.20	24	3.68
Total VOC	0.82	8.21		3.68

<sup>&</sup>lt;sup>1</sup> Phenol based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used. IPE based on stack testing conducted by SETCO, June 2005. The average and maximum are based on the maximum of the 4 test runs.

<sup>&</sup>lt;sup>2</sup> Max hourly occurs duing startups (condenser and scrubber operating, but higher than normal flow for short period of time). Assume maximum is 10 times the average. After shutdown, emissions are negligible for duration of outage because the vessel vents are valved closed.

Baton Rouge, East Baton Rouge Parish, Louisiana

Cathyval Plant

Unit:

Cathy

EIQ I.D.:

304

Description:

PC Flaker Vent Scrubber C-561 (P&I.D. F508)

		Normal Operation <sup>3</sup>		Hot Wate	r Flush	Overall Emissions			
							Maximum Hourly	Annual	
	Removal Efficiency	Emissions <sup>1</sup>		Emissions		Hourly Emissions	Emissions	Emissions	
	(%)	(lbs/hr)	Hrs/Yr	$(lbs/hr)^2$	Hrs/Yr	(lbs/hr)	(lbs/hr)	(tpy)	
Pyrocatechol	≥98	0.010	8744	0.300	16	0.011	0.300	0.046	
Total VOC						0.011	0.300	0.046	

<sup>&</sup>lt;sup>1</sup> Cathy Project Air Permit Data, Section 5, 3/6/90, outlet flow.

<sup>&</sup>lt;sup>2</sup> Cathy Project Air Permit Data, Section 5, 3/6/90, inlet flow.

<sup>&</sup>lt;sup>3</sup> Includes a planned plant outage with the scrubber off. Emissions are less than or equal to normal emissions due to low vapor pressure materials. Scrubber will be back online before vessels are heated.

Baton Rouge, East Baton Rouge Parish, Louisiana Cathyval Plant

Unit:

Cathy

EIQ I.D.:

306

Description:

Seal Pot D-669 For Chrystallization (P&I.D. F607)

	Removal Efficiency (%)	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)	Basis
other VOCs	0	0.005	0.01	0.02	1
Hydroquinone	0	0.01	0.02	0.04	1
Total VOC		0.015	0.03	0.06	

Average emission rates are from Cathy Project Air Permit Data, Section 5, 3/6/90.
Maximum emission rates are conservatively estimated as twice the average emission rates.

Baton Rouge, East Baton Rouge Parish, Louisiana

**Cathyval Plant** 

Unit:

Cathy

EIQ I.D.:

316

**Description:** 

Pressure Relief Filter Drying Vent Y-625 (P&I.D. F-603)

#### From Cathy Project Air Permit Data, Section 6, 3/6/90:

Flow of nitrogen per drying charge	225	SCF
charges per cycle	4	
cycles per day	2	
max conc of HQ in nitrogen	5.0E-05	lb/lb
MW of nitrogen	28	lb/lbmole
molar density	359	SCF/lbmole
HQ emitted per day	0.0070	lbs
HQ emitted per year	2,56	lbs
HQ max hourly (daily/2)	0.004	lbs/hr

-100		Maximum Hourly	Annual
	Average Hourly	Emissions	Emissions <sup>1</sup>
	Emissions (lbs/hr)	(lbs/hr)	(tpy)
HQ	0.0003	0.004	0.001
total VOC	0.0003	0.004	0.001

Baton Rouge, East Baton Rouge Parish, Louisiana

**Cathyval Plant** 

Unit:

Cathy

EIQ I.D.:

317

Description:

Vacuum Clean-up Packaging Baghouse Y-760X (P&I.D. F703)

Drums of PM collected per year	10
Weight of drum	300 lbs
Total PM collected	3000 lbs/yr
Max hourly PM collected <sup>2</sup>	400 lbs/hr
Operating Hours:	8760
Efficiency of Dust Collector:	99.9%
Assumed Fraction that is HQ:	80.0%
Assumed Fraction that is PC:	20.0%

	Average Hourly Emission Rate (lb/hr)	Maximum Hourly Emission Rate (lb/hr)	Annual Emissions (tons/yr)
PM <sub>10</sub>	0.0003	0.40	0.002
	0.0003	0.32	0.001
HQ PC	0.0001	0.08	0.0003

#### PM Emissions From Baghouses:

					PM10 Em	issions	
EIQ I.D.	Description	Material Handled (lbs/day)	Efficiency (%)	Operating Hours (hrs/yr)	Average (lbs/hr)	Max <sup>1</sup> (lbs/hr)	Annual (tpy)
307	Sulfite Metabasulfite Bag Dump Station Baghouse S-603 for D601	22.8	99.90%	8760	0.001	0.002	0.004
308 309	Oxalic Acid Bag Dump Station Baghouse S-663 for D660 DELETE	22	99.90%	8760	0.001	0.002	0.004
310	Carbon Bag Dump Station Baghouse S-615 for D618	14	99.90%	8760	0.001	0.001	0.003

					PM10 Em	issions		HQ Emis	sions			PC Emis	sions		
		Dust		Operating											1
		Collected	Efficiency	Hours	Average	$\mathbf{Max}^{1}$	Annual		Average	Max <sup>1</sup>	Annual		Average	Max <sup>1</sup>	Annual
EIQ I.D.	Description	(MT/yr)	(%)	(hrs/yr)	(lbs/hr)	(lbs/hr)	(tpy)	% HQ	(lbs/hr)	(lbs/hr)	(tpy)	% PC	(lbs/hr)	(lbs/hr)	(tpy)
203	Baghouse for HQ/PC Handling	1.0	98%	1000	0.045	0.090	0.022	100%	0.045	0.090	0.022	100%	0.045	0.090	0.022
311	PC Packaging Baghouse Y-731	10.0	98%	8760	0.051	0.103	0.224	0%				100%	0.051	0.103	0.224
312	HQ Packaging Baghouse Y-716	10.0	98%	8760	0.051	0.103	0.224	100%	0.051	0.103	0.224	0%			
313	HQ Rework Dumper Baghouse S-693 for D607 <sup>2</sup>	1.0	98%	8760	0.005	0.010	0.022	100%	0.005	0.010	0.022	0%			

<sup>&</sup>lt;sup>1</sup>Maximum emissions assumed to be twice the average.

<sup>&</sup>lt;sup>2</sup>Baghouse may or may not be used for HQ rework. If not used, majority of emissions are not air-borne and the amount emitted to atmosphere will be no more than listed here.

Unit:

Cathy

EIQ I.D.:

315A

Description:

Backup Fluid Heater F-962 (P&I.D. F927)

	Average	Maximum
Heat Input (MMBtu/hr)	6	6
Fuel Flowrate (scfh)	6000	6000
Hrs. of Operation/Yr	3024	

(24 hr/day, 7 days/wk, 18 wks/yr)

	Emission Factor (lb/MMscf) <sup>1</sup>	Average Hourly Emission Rate (lb/hr)	Maximum Hourly Emission Rate (lb/hr)	Annual Emissions (tons/yr)
$PM_{10}$	7.6	0.046	0.046	0.069
PM <sub>10</sub> SO <sub>2</sub>	0.6	0.004	0.004	0.005
NO <sub>X</sub>	100	0.600	0.600	0.907
CO	84	0.504	0.504	0.762
VOC	5.5	0.033	0.033	0.050

 $<sup>^1</sup>$  AP-42 emission factors from Title 1, Chapter 4, *Natural Gas Combustion*, Tables 1.4-1,2,3, 7/98. NO<sub>X</sub> and CO emission factors were based on a small boiler (<100 MMBTU/hr) with uncontrolled emissions.

Unit:

Cathy

EIQ I.D.:

315B

Description:

Primary Fluid Heater F-971 (P&I.D. F925)

	Average	Maximum
Heat Input (MMBtu/hr)	8	8
Fuel Flowrate (scfh)	8000	8000
Hrs. of Operation/Yr	8760	

	Emission Factor	Average Hourly Emission Rate	Maximum Hourly Emission Rate	Annual Emissions
	(lb/MMscf) <sup>1</sup>	(lb/hr)	(lb/hr)	(tons/yr)
$PM_{10}$	7.6	0.061	0.061	0.266
SO <sub>2</sub>	0.6	0.005	0.005	0.021
NO <sub>x</sub>	100	0.800	0.800	3.504
CO	84	0.672	0.672	2.943
VOC	5.5	0.044	0.044	0.193

Notes:  $^1$  AP-42 emission factors from Title 1, Chapter 4, Natural Gas Combustion , Tables 1.4-1,2,3, 7/98. NO $_X$  and CO emission factors were based on a small boiler (<100 MMBTU/hr) with uncontrolled emissions.

Emission Calculations

Unit:

Cathy F-6C

EIQ I.D.: Description:

Cathy Fugitive Emissions

Cathy Unit Fugitive Emissions

Percent Leakers: 1.5%

Type of Component	Service	Tagged Components <sup>1</sup>	Assumed Leakers <sup>6</sup>	Assumed Non-Leakers <sup>6</sup>	Assumed Screening Value (ppmw)	SOCMI Correlation Approach Emission Factor <sup>3</sup> (kg/hr/component)	Zero Emission Factor <sup>4</sup>	Total Emission Rate from Leaking Components (kg/hr)	Total Emission Rate from Non-leaking Components (kg/hr)	Total Emission Rate (kg/hr)	Hourly Emission Rate (lb/hr)
Valves	Heavy Liquid	95	1	94	10,000	0.010	4.90E-07	1.00E-02	4.61E-05	1.00E-02	2.22E-02
	Light Liquid	58	1	57	10,000	0.010	4.90E-07	1.00E-02	2.79E-05	1.00E-02	2.21E-02
	Gas Vapor	221	3	218	10,000	0.006	6.60E-07	1.80E-02	1.44E-04	1.81E-02	4.00E-02
Pumps	Heavy Liquid	3	0	3	10,000	0.038	7,50E-06	0.00E+00	2.25E-05	2.25E-05	4.96E-05
	Light Liquid	2	0	2	10,000	0.038	7.50E-06	0.00E+00	1.50E-05	1.50E-05	3.31E-05
Connectors	Heavy Liquid	148	2	146	10,000	0,011	6.10E-07	2.20E-02	8.91E-05	2.21E-02	4.87E-02
	Light Liquid	105	2	103	10,000	0.011	6.10E-07	2.20E-02	6.28E-05	2.21E-02	4.86E-02
	Gas Vapor	221	3	218	10,000	0.011	6.10E-07	3.30E-02	1.33E-04	3.31E-02	7.31E-02
PRDs	Heavy Liquid	1	0	1	10,000	0.038	7.50E-06	0,00E+00	7.50£-06	7.50E-06	1.65E-05
	Gas Vapor	19	0	19	10,000	0.038	7,50E-06	0.00E+00	1.43E-04	1.43E-04	3.14E-04
Compressors		0	**	-							
Agitators		0									
Total VOC											2,55E-01

#### Speciation of Emissions from the Cathy Uni-

	Maximum % of	Hourly Emission	Annual Emission
	Total Emissions	Rate	Rate
		(lb/hr)	(tpy)
Phenol	25%	0.064	0.279
Hydroquinone	1%	0.003	0.011
Pyrocatechol	1%	0.003	0.011
Total VOC		0.255	1.117

Daphne F-6D

Unit: EIQ I.D.: Description:

Daphne Fugitive Emissions

Daphne Unit Fugitive Emissions

Percent Leakers: 1.0%

Type of Component	Service	Tagged Components <sup>t</sup>	Assumed Leakers <sup>6</sup>	Assumed Non-Leakers <sup>6</sup>	Assumed Screening Value (ppmw)	SOCMI Correlation Approach Emission Factor <sup>3</sup> (kg/hr/component)	Zero Emission Factor <sup>4</sup>	Total Emission Rate from Leaking Components (kg/hr)	Total Emission Rate from Non-leaking Components (kg/hr)	Total Emission Rate (kg/hr)	Hourly Emission Rate (lb/hr)
Valves	Light Liquid	200	2	198	10,000	0.010	4.90E-07	2.00E-02	9.70E-05	2.01E-02	4.43E-02
i	Gas Vapor	286	3	283	10,000	0.006	6.60E-07	1.80E-02	1.87E-04	1.82E-02	4.01E-02
Pumps	Light Liquid	8	0	8	10,000	0.038	7.50E-06	0.00E+00	6.00E-05	6,00E-05	1.32E-04
Connectors	Light Liquid	85	1	84	10,000	0.011	6.10E-07	1.10E-02	5.12E-05	1.11E-02	2.44E-02
	Gas Vapor	111	í	110	10,000	0.011	6.10E-07	1.10E-02	6.71E-05	1.11E-02	2.44E-02
PRDs	Light Liquid	3	0	3	10,000	0.038	7.50E-06	0.00E+00	2.25E-05	2.25E-05	4.96E-05
	Gas Vapor	19	0	19	10,000	0.038	7.50E-06	0.00E+00	1.43E-04	1.43E-04	3.14E-04
Compressors	Gas Vapor	1	0	1	10,000	0.038	7.50E-06	0.00E+00	7.50E-06	7.50E-06	1.65E-05
Agitators	Gas Vapor	2	0	2	10,000	0.038	7.50E-06	0.00E+00	1,50E-05	1.50E-05	3.31E-05
Total VOC											1.34E-01

#### Speciation of Emissions from the Daphne Uni

	Maximum % of	Hourly Emission	Annual Emission
	Total Emissions	Rate	Rate
		(lb/hr)	(tpy)
Hydroquinone	1%	0.001	0.006
Pyrocatechol	5%	0.007	0.029
Methyl chloride	40%	0.053	0.234
Ethyl chloride	20%	0.027	0.117
Total VOC		0.134	0.586

Unit: EIQ I.D.; Vanessa F-6V

Description:

Vanessa Fugitive Emissions

Vanessa Unit Fugitive Emissions

Percent Leakers: 0.5%

Type of Component	Service	Tagged Components <sup>1</sup>	Assumed Leakers <sup>6</sup>	Assumed Non-Leakers <sup>6</sup>	Assumed Screening Value (ppmw)	SOCMI Correlation Approach Emission Factor <sup>3</sup> (kg/hr/component)	Zero Emission Factor <sup>4</sup>	Total Emission Rate from Leaking Components (kg/hr)	Total Emission Rate from Non-leaking Components (kg/br)	Total Emission Rate (kg/hr)	Hourly Emission Rate (lb/hr)
Valves	Light Liquid	611	3	608	10,000	0.010	4.90E-07	3.00E-02	2.98E-04	3.03E-02	6.68E-02
	Gas Vapor	166	1	165	10,000	0.006	6.60E-07	6,00E-03	1.09E-04	6.11E-03	1.35E-02
Pumps	Light Liquid	21	0	**			**				
Connectors	Light Liquid	185	1	184	10,000	0.011	6.10E-07	1.10E-02	1.12E-04	1.11E-02	2.45E-02
	Gas Vapor	56	0	56	10,000	0.011	6.10E-07	0.00E+00	3.42E-05	3.42E-05	7.53E-05
PRDs	Light Liquid	3	0	3	10,000	0.038	7.50E-06	0.00E+00	2.25E-05	2.25E-05	4.96E-05
	Gas Vapor	20	0	20	10,000	0.038	7.50E-06	0.00E+00	1.50E-04	1.50E-04	3.31E-04
Compressors		0			-						
Agitators		0									
Total VOC											1.05E-01

#### Speciation of Emissions from the Vanessa Unit

	Estimated % of	Hourly Emission	Annual Emission
	Total Emissions	Rate	Rate
		(lb/hr)	(tpy)
Methanol	40%	0.042	0.185
MIBK	60%	0.063	0.277
Total VOC		0.105	0.462

<sup>&</sup>lt;sup>1</sup> Component counts from LeakDAS database January 2010. Most heavy liquid components are not tagged, but may contribute emissions. The assumed leak rate is conservatively high and should account for any additional emissions from non-tagged components.

<sup>&</sup>lt;sup>3</sup> EPA-453/R-95-017, Protocol for Equipment Leak Emission Estimates, November 1995, Table 2-9. SOCMI Leak Rate/Screening Value Correlations. Use LL valve equation for the HL valves.

<sup>&</sup>lt;sup>4</sup> EPA-453/R-95-017, Protocol for Equipment Leak Emission Estimates, November 1995, Table 2-11. Default-Zero Values: SOCMI Process Units.

<sup>6</sup> All Vanessa pumps are dual mechanical seal and are assumed to have zero emissions. For other components, assumed percentage of components leaking: 1.5% for Cathy, 1.0% for Daphne, and 0.5% for Vanessa.

Unit:

Cathy, Vanessa

EIQ I.D.:

M-5

Description:

Cathy (E925) and Vanessa (E907) Cooling Towers

Description	Recirculation Rate (gpm)	Conductivity <sup>1</sup>	TDS <sup>2</sup> (ppm)	PM-10 Emissions <sup>3</sup> (lb/hr)	PM-10 Emissions (tpy)
Cathy Cooling Tower	9,000	3000	2190	2.01	8.80
Vanessa Cooling Tower	10,000	3000	2190	2.23	9.77
Total				4.24	18.57

<sup>&</sup>lt;sup>1</sup> Conservative estimate based on control limits.

 $<sup>^{2}</sup>$  TDS estimated to be 0.73  $^{\star}$  (conductivity) per study conducted by Rhodia Lab.

<sup>&</sup>lt;sup>3</sup> PM<sub>10</sub> emission rate = (Total Liq. Draft Factor) x (TDS) x (Recirculation Rate) where total liquid drift factor for induced draft tower = 1.7 lb/1000 gal (AP-42 Table 13.4-1)

Baton Rouge, East Baton Rouge Parish, Louisiana Cathyval Plant

Unit:

**Cathyval Plant** 

EIQ I.D.:

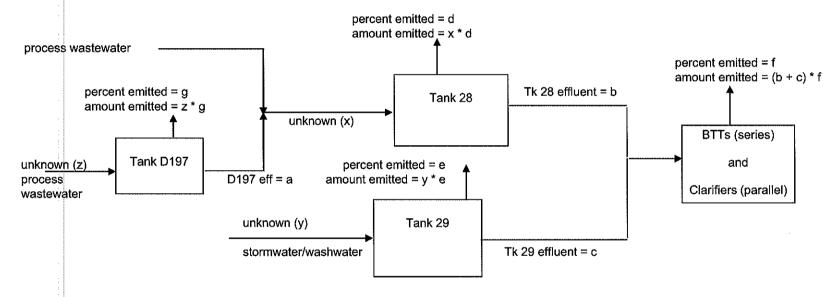
WWT

Description:

**Wastewater Treatment Plant** 

#### Overall Method:

Data collected on Tanks 28, 29, and D197 represent the effluents from these tanks. Water9 V2 is used to iteratively back-calculate influent and then fraction emitted.



$$z = a / (1 - g)$$

$$x = b / (1 - d)$$

$$y = c / (1 - e)$$

Total emitted = 
$$(z * g) + (x * d) + (y * e) + (b + c) * f$$

#### Input Data - Wastewater

		Tank D197 Effluent	Tank 28 Effluent	Tank 29 Effluent
	Units	(a)	(b)	(c)
Hydroquinone	ppmw	139	25.7	8.0
Pyrocatechol	ppmw	104	50	13
Phenol	ppmw	104	30	2
Methanol	ppmw		160	15
Isopropyl Ether	ppmw	50	47	8
MIBK	ppmw		138	12
Guaiacol	ppmw		150	27
Guetol	ppmw		200	27
Ethanol	ppmw		300	10
Veratrole	ppmw		100	8

#### Input Data - Tanks

	Units	Tank D197	Tank 28	Tank 29	
	Office	(a)	(b)	(c)	
Net Flow	gpm	48	260	290	
Internal Recycle Flow	gpm	60	25	25	
Total Flow	gpm	108	285	315	
Wastewater temperature	C	31	25	25	
Open Surface area of Tank	m <sup>2</sup>	38.59	181.36	467.36	
Density of liquid in tank	g/cc	1	1	1	
Tank Diameter	m	7.01	15.2	24.4	
Tank Height	m	4.88	12.2	12.2	
Tank Vapor space height	m	4.12	2	2	
Diurnal Temp. Change	С	12	12	12	

#### Input Data - Aeration Basins

	Units	East Basin	West Basin
Wastewater Temperature	С	25	25
Length of aeration unit	m	43.3	43.3
Width of aeration unit	m	21.9	21.9
Depth of aeration unit	m	6.1	6.1
Area of agitation	m²	47	47
Power of agitation	HP	7.5	7.5
Aerator effectiveness	alpha	0.83	0.83
Overall Biorate	mg/g bio-hr	19	19
Aeration air flow	m3/s	1.11	1.11
Activated Sludge Biomass	g/l	4	4

#### Input Data - Clarifiers

	Units	West Clarifier	East Clarifier
Wastewater Temperature	С	25	25
Secondary Clarifier Diameter	m	18.3	18.3
Secondary Clarifier Depth	m	4.27	4.27
Clarifier solids removal effeciency		99%	99%
Waterfall drop height	cm	30.48	30.48
Clarifier weir/circumference		0.5	0.5

#### Tank D197 Calculations

	Effluent	Percent Emitted <sup>2</sup>	Influent (Ibs/day) <sup>2</sup>	Influent	Emissions (g/s) <sup>3</sup>	Emissions (lbs/hr)
	(lbs/day) <sup>1</sup>			(ppm) <sup>2</sup>		
	(a)	(a)	(z)	(z)	(z*a)	(z*g)
Hydroquinone	80.03	0.000000	80.03	139.00	1.35E-07	0.000001
Pyrocatechol	59.88	0.143000	59.97	104.15	4.50E-04	0.003572
Phenol	59.88	0.125000	59.95	104.13	3.94E-04	0.003127
Methanol						
Isopropyl Ether	28.79	6.577000	30.82	53.52	1.07E-02	0.084923
MIBK	·					
Guaiacol						
Guetol						
Ethanol						
Veratrole						

#### Tank 28 Calculations

	Effluent (lbs/day) <sup>1</sup>	Percent Emitted <sup>2</sup>	Influent (Ibs/day) <sup>2</sup>	Influent (ppm) <sup>2</sup>	Emissions (g/s) <sup>3</sup>	Emissions (lbs/hr)
	(b)	(d)	(x)	(x)	(x*d)	(x*d)
Hydroquinone	80.15	0.00001	80.15	25.70	5.17E-08	0.000000
Pyrocatechol	155.94	0.06715	156.04	50.03	5.52E-04	0.004381
Phenol	93.56	0.06278	93.62	30.02	3.10E-04	0.002460
Methanol	499.00	2.56479	512.14	164.21	6.93E-02	0.550012
Isopropyl Ether	146.58	6.12720	156.15	50.07	5.04E-02	0.400009
MIBK	430.39	5.93374	457.54	146.71	1.43E-01	1.134946
Gualacol	467.81	0.09830	468.27	150.15	2.43E-03	0.019286
Guetol	623.75	0.01999	623.88	200.04	6.57E-04	0.005214
Ethanol	935.63	1.81555	952.93	305.55	9.12E-02	0.723825
Veratrole	311.88	0.00009	311.88	100.00	1.49E-06	0.000012

#### Tank 29 Calculations

İ	Effluent	Percent	Influent	influent	Emissions	Emissions	
	(lbs/day) <sup>1</sup>	Emitted <sup>2</sup>	(lbs/day) <sup>2</sup>	(ppm) <sup>2</sup>	(g/s) <sup>3</sup>	(lbs/hr)	
	(c)	(e)	(v) **	`` (v)	(v*e)	(y*e)	
Hydroquinone	27.83	0.00000	27.83	8.00	3.94E-08	0.000000	
Pyrocatechol	45.22	1.47225	45.90	13.19	3.56E-04	0.002825	
Phenol	6.96	0.13762	6.97	2.00	5.07E-05	0.000402	
Methanol	52.18	5.61272	55.28	15.89	1.60E-02	0.126987	
Isopropyl Ether	27.83	13.54435	32.19	9.25	2.30E-02	0.182544	
MIBK	41.74	13,11341	48.04	13.81	3.32E-02	0.263498	
Guaiacol	93.92	0.21553	94.13	27.06	1.07E-03	0.008492	
Guetol	93.92	0.04382	93.96	27.01	2.17E-04	0.001722	
Ethanol	34.79	3.97978	36.23	10.41	7.61E-03	0.060398	
Veratrole	27.83	0.00022	27.83	8.00	2.92E-07	0.000002	

#### BTTs/Clarifiers Calculations

	Percent	Influent	Influent	Emissions	Emissions (lbs/hr)	
	Emitted <sup>4</sup>	(lbs/day) <sup>5</sup>	(ppm) <sup>6</sup>	(g/s) <sup>4</sup>		
	(h)	(v)	" (v)	(v*e)	(y*e)	
Hydroquinone	0.00000	107.98	16.37	4.51E-09	0.000000	
Pyrocatechol	0.00200	201.16	30.49	2.53E-05	0.000201	
Phenol	0.00000	100.52	15.24	3.65E-07	0.000003	
Methanol	0.19400	551.18	83.55	5.62E-03	0.044604	
Isopropyl Ether	0.36800	174.41	26.44	3.37E-03	0.026747	
MIBK	1.73800	472.13	71.56	4.32E-02	0.342865	
Guaiacol	0.00300	561.74	85.15	9.52E-05	0.000756	
Guetol	0.00000	717.67	108.78	1.73E-05	0.000137	
Ethanol	0.03200	970.41	147.09	1.65E-03	0.013096	
Veratrole	0.00000	339.70	51,49	2.16E-08	0.000000	

Total Emissions (HAPs in bold)		•			For EIQ	) Form
	D197	Tk 28	Tk 29	BTTs/Clarifiers	Average	Annual
	Emissions	Emissions	Emissions	Emissions	<b>Emissions</b>	Emissions
	(lbs/hr)	(lbs/hr)	(ibs/hr)	(lbs/hr)	(lbs/hr)	(tpy)
Hydroquinone	0.00000107	0.00000041	0.00000031	0.00000004	0.000002	0.00001
Pyrocatechol	0.00357151	0.00438105	0.00282546	0.00020080	0.011	0.048
Phenol	0.00312705	0.00246037	0.00040239	0.00000290	0.006	0.026
Methanol	0.00000000	0.55001213	0.12698693	0.04460416	0.722	3.161
Isopropyl Ether	0.08492251	0.40000882	0.18254371	0.02674662	0.694	3.041
MIBK	0.00000000	1.13494566	0.26349787	0.34286470	1.741	7.627
Guaiacol	0.00000000	0.01928614	0.00849225	0.00075557	0.029	0.125
Guetol	0.00000000	0.00521440	0.00172226	0.00013730	0.007	0.031
Ethanol	0.00000000	0.72382548	0.06039816	0.01309553	0.797	3.492
Veratrole	0.00000000	0.00001183	0.00000232	0.0000017	0.00001	0.0001
Total VOC	0.09162214	2.84014628	0.64687165	0.42840779	4.007	17.55

<sup>&</sup>lt;sup>1</sup> Calculated from concentration and flow.

<sup>&</sup>lt;sup>2</sup> Determined iteratively by Water9. First, set influent = effluent as initial guess, then use Water 9 to calculate percent emitted. Use this result to to back-calculate influent from effluent. Then, run Water9 again using improved estimate of influent. Repeat as needed.

<sup>&</sup>lt;sup>3</sup> Water9 result using back-calcualted influent.

<sup>&</sup>lt;sup>4</sup> Water9 result.

Sum of Tank 28 and Tank 29 effluents.
 Flow-weighted average of Tank 28 and Tank 29 effluents.

Baton Rouge, East Baton Rouge Parish, Louisiana

**Cathyval Plant** 

Unit:

Cathy, Daphne & Vanessa

EIQ I.D.:

Description:

**Cathyval Sumps** 

#### Input Data - Wastewater

	Units	Cathy High Risk Sump	Cathy Low Risk Sump	Daphne & Vanessa Process Sump
Pyrocatechol	ppmw	91	3.3	0.8
Phenol	ppmw	71	3.48	
Hydroquinone	ppmw	158	0.45	
Isopropyl Ether	ppmw	30	4.2	2.1
MIBK	ppmw			0.6
Guaiacol	ppmw		-	3.2

#### Input Data - Sumps

		Cathy	Cathy	Daphne &
				Vanessa
		High Risk	Low Risk	Process
	Units	Sump <sup>1</sup>	Sump <sup>2</sup>	Sump <sup>2</sup>
Flow	gpm	12.9	66.4	132.9
Underflow T	С	25	25	25
Area of openings at unit	cm <sup>2</sup>	843.8	731.15	675.4
Radius of drop pipe	cm	5	5	5
Drop length to conduit	cm	61	61	61
Radius of underflow conduit	cm	3.81	13.97	6.8
Distance to next unit	cm	500	500	500
Slope of underflow conduit		0.015	0.015	0.015
Open surface of liquid at the unit	cm <sup>2</sup>	62710	233419	348386
Flow entrance depth	cm	45.72	38,11	30.5
Depth of liquid in sump	cm	213	213	50
Velocity air at opening	ft/min	88	88	88

**Cathy High Risk Sump Calculations** 

	Effluent	Percent	Influent	Influent	Emissions	Emissions	
	(lbs/day) <sup>1</sup>	Emitted <sup>2</sup>	(lbs/day) <sup>2</sup>	(ppm) <sup>2</sup>	(q/s) <sup>3</sup>	(lbs/hr)	
Pyrocatechol	14.08	1.49E-04	14.08	91.00	8.95E-08	0.000001	
Phenol	10.99	8.63E-02	11.00	71.06	5.05E-05	0.000401	
Hydroquinone	24.45	0.00E+00	24.45	158.00	7.60E-09	0.000000	
Isopropyl Ether	4.64	3.10E-01	4.66	30.09	7.73E-05	0.000614	
MIBK							
Guaiacol							

**Cathy Low Risk Sump Calculations** 

	Effluent	Percent	Influent	Influent	Emissions	Emissions
ĺ	(lbs/day) <sup>1</sup>	Emitted <sup>2</sup>	(lbs/day) <sup>2</sup>	(ppm) <sup>2</sup>	$(q/s)^3$	(lbs/hr)
Pyrocatechol	2.63	0.00E+00	2.63	3.30	1.21E-08	0.000000
Phenol	2.77	7.38E-02	2.78	3.48	1.08E-05	0.000086
Hydroquinone	0.36	0.00E+00	0.36	0.45	8.04E-11	0.000000
Isopropyl Ether	3.35	5.74E-01	3.37	4.22	1.02E-04	0.000810
MIBK						
Guaiacol						

Daphne and Vanessa Process Sump Calculations

	Effluent	Percent	Influent	Influent	Emissions	Emissions	
	(lbs/day) <sup>1</sup>	Emitted <sup>2</sup>	(lbs/day) <sup>2</sup>	(ppm) <sup>2</sup>	(q/s) <sup>3</sup>	(lbs/hr)	
Pyrocatechol	1.27	0.00E+00	1.27	0.80	4.37E-09	0.000000	
Phenol		-					
Hydroquinone		-					
Isopropyl Ether	3.35	1.55E+00	3.40	2.13	2.79E-04	0.002214	
MIBK	0.96	1.01E+00	0.97	0.61	5.17E-05	0.000410	
Guaiacol	5.10	2.23E-02	5.10	3.20	6.02E-06	0\000048	

Total Emissions (HAPs in bold)				For EIQ Form		
-	Cathy	Cathy	Daphne &			
		·	Vanessa			
	High Risk	Low Risk	Process	Average	Annual	
	Sump	Sump	Sump	Emissions	Emissions	
	(lbs/hr)	(lbs/hr)	(lbs/hr)	(lbs/hr)	(tpy)	
Pyrocatechol	7.10E-07	9.60E-08	3.47E-08	0.000	0.000	
Phenol	4.01E-04	8.57E-05	0.00E+00	0.000	0.002	
Hydroquinone	6.03E-08	6.38E-10	0.00E+00	0.000	0.000	
Isopropyl Ether	6.14E-04	8.10E-04	2.21E-03	0.004	0.016	
MIBK	0.00E+00	0.00E+00	4.10E-04	0.000	0.002	
Guaiacol	0.00E+00	0.00E+00	4.78E-05	0.000	0.000	
Total VOC				0.0046	0.02	

Calculated from concentration and flow.
 Determined iteratively by Water9. First, set influent = effluent as initial guess, then use Water 9 to calculate fraction
 Water9 result using back-calculated influent.
 Water9 result.

#### **EMISSIONS SUMMARY**

EPN	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>X</sub>	со	VOC Total	Ethyl chloride	Hydroquin one	Methanol	Methyl chloride	Methyl isobutyl ketone	Phenol	Pyrocatec hol
101	0	0	0	0	0.16		-	<0.01	-	0.16	-	-
102	0	0	0	0	0.01	-	-	-	-	-	-	-
103	0	0	0	0	0.05	-	-	-	-	-	-	-
104	0	0	0	0	0.12	-	-	-	-	0.12	-	-
105	0	0	0	0		-	-		-		-	-
106	0	0	0	0	0.90	-	_	-	-	0.90	-	-
107	Ō	0	0	0	0.01	_	-	=	-	0.01	_	-
108	Ō	Ō	0	0	0.01	-	-	0.01	-	-	-	-
109	0.07	0	0	0	0	-	-	-	-	-	-	_
110	0	Õ	Ō	Ō	0.01	-	-	-	-	-	-	
111	Ō	Ö	ō	Ō	0.08	_	_	0.01	_	<0.01	_	-
201	ŏ	ŏ	Ö	Ö	0.03	_		_	-	-		0.03
202	ŏ	ŏ	Ö	Ö	0.78	_	< 0.01	<0.01	_	-		0.02
203	0.02	Õ	0	ŏ	0	-	0.02	-	_	-	_	0.02
301	0	ŏ	ŏ	ŏ	0.19	-	< 0.01	~	_	-	0.17	0.02
302	ŏ	ő	ő	Õ	0.34	_	_	-	-	-	0.02	-
303	ő	Ö	0	Ŏ	3.68	-		-	_	-	<0.01	<del></del>
304	Ö	Ŏ	0	ŏ	0.05	-	_	-	_	-	-	0.05
306	ő	-	-	-	0.06	_	0.04	_	_	-	_	-
307	<0.01	0	0	0	0	_	-	_	-	_	_	_
308	<0.01	0	0	0	ŏ	_	_	_	-	_	-	_
309	~0.01 	Ö	0	0	0	_	_	_	_	-	_	_
310	<0.01	0	0	0	0	_	_	_	_	-	_	-
311	0.22	0	0	0	ő	_	_	_	_	_	-	0.22
312	0.22	Ö	0	0	Ö	_	0.22	_	_	_	-	
313	0.22	0	0	0	0	_	0.02	_	_	-	_	_
	0.02	0.01	0.91	0.76	0.05	_	-	_	_	_	_	_
315A 315B	0.07	0.01	3.50	2.94	0.19	_	_	_	_	_		_
		0.02	0	2.94	<0.01	-	<0.01	_	_	_	_	_
316			0	0	0.01	-	<0.01		_	_	_	<0.01
317	<0.01	0		0	1.12	-	0.01	_	_	-	0.28	0.01
F-6C	0	0	0 0	0	0.59	0.12	0.01	<u>-</u>	0.23	_	-	0.03
F-6D	0	0		0	0.59	0.12	0.01	0.18	-	0.28	_	-
F-6V	0	0	0 0	0	17.55	-		3.16	-	7.63	0.03	0.05
WWT	0	0		_	0	-		3.10	_	7.00	0.00	-
M-5	18.57	0	0	0	0.02	•	-	-	-	<0.01	<0.01	-
M-6	, 0	0	0	0	0.02	-		-	-	-0.01	-0.01	
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	-	-	-	-	-	-	-	-	-	-	-	-
	40.74		4 4 4	~ ~ ~	-	0.40	0.37	3.38	0.23	9.11	0.51	0.47
Total	19.51	0.03	4.41	3.71	26.46	0.12	0.37	ა.აბ	V.Z3	J. 1 1	0.51	0.47

## SECTION 7.0 CERTIFICATE OF GOOD STANDING



# Louisiana Secretary of State COMMERCIAL DIVISION Corporations Database



### Louisiana Secretary of State Detailed Record

Charter/Organization ID: 34605553F

Name: RHODIA INC.

Type Entity: Business Corporation (Non-Louisiana)

Status: Active

Annual Report Status: In Good Standing Add Certif

Add Certificate of Good Standing to Shopping Cart

Last Report Filed on 02/09/2007

Mailing Address: 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Domicile Address: 1209 ORANGE STREET, WILMINGTON, DE 19801

Principal Office: 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Principal Bus. Est. in Louisiana: 1275 AIRLINE HIGHWAY, BATON ROUGE, LA 70805

Qualified: 01/13/1998

Registered Agent (Appointed 1/13/1998): C T CORPORATION SYSTEM, 8550 UNITED PLAZA BLVD., BATON RC

LA 70809

President: JAMES HARTON, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Director: JAMES HARTON, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

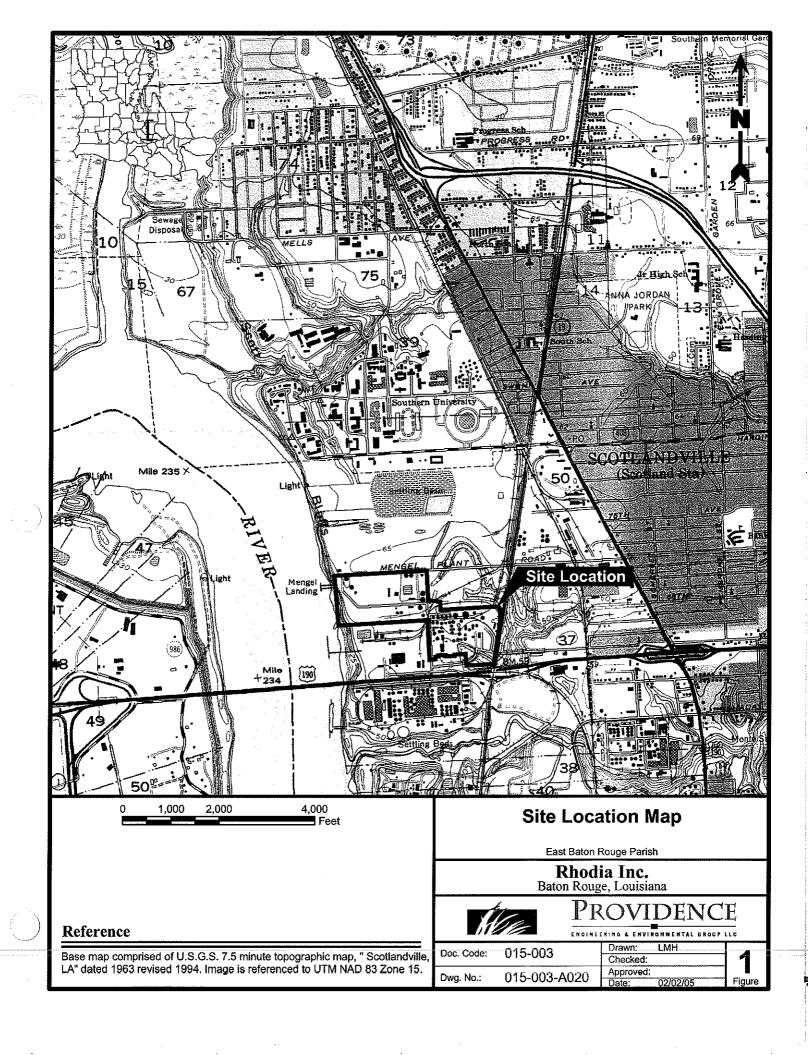
Vice President: JERRY KRING, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Vice President: JOHN P. DONAHUE, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Secretary: JOHN P. DONAHUE, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Additional officers may exist on document

### FIGURE 1 SITE LOCATION MAP



#### **APPENDIX A**

### LETTER OF APPROVAL OF ALTERNATE MEANS OF COMPLIANCE



#### DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO GOVERNOR

MIKE D. McDANIEL, Ph.D. **SECRETARY** 

April 24, 2006 Rec'd —

02 1A 5 00 308 0004340143 JUN 09 2006 MAILED FROM ZIP CODE 70802

Mr. John Richardson Rhodia, Inc. PO Box 828 Baton Rouge, LA 70821

RE:

Alternative Monitoring Request for Scrubber C-402

Stack Test: June 29, 2005

Permit Number: 2184-V0, Agency Interest #: 1314

TEMPO #: ENG20060003

Dear Mr. Richardson:

The Louisiana Department of Environmental Quality (LDEQ) received the above referenced report on November 28, 2005. The report summarizes the results of the compliance tests performed by SETCO. Engineering Support of LDEQ has reviewed the report and this letter covers the findings.

The test procedures and calculations presented in the report were found to be acceptable. There was a pre-test meeting with the Department on June 7, 2005.

Methods 1A, 2A, 3 and 4 were used to determine sample points, stack gas velocity, volumetric flow rate, molecular weight, and moisture content on the inlet and outlet vent. Isopropyl ether gaseous emission samples were collected with a NIOSH Method 1618 sampling system and subsequently analyzed by Method 1618 by gas chromatography.

TRE index values were calculated by the incinerator and flare equations outlined in LAC:33:III.2147.D. The performance test series consisted of 4 1-hour runs. The following table shows the results.

Scrubber C-402	Run 1	-Run 2	Run 3	Run 4
Scrubber Flow, gpm	4	4	6	8
Isopropyl Ether, lb/hr	0.82	0.16	0.54	0.20
Required TRE	1	1	1	1
TRE Index Value	5.98	28.54	8.90	23.60

Mr. John Richardson Rhodia, Inc. Page 2

Rhodia has requested that the scrubber flow rate be monitored as an alternative to LAC:33:III.2147.E.4.a. The minimum flow rate required by the permit is 4gpm. The scrubber is equipped with a low flow alarm. It is the opinion of Engineering Support that this alternative is acceptable. All other Specific Requirements of the permit must be complied with.

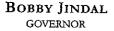
If you have any questions concerning the review of this request, please contact Jennifer Pelloat at 225-219-3432.

Sincerely,

Jennifer J. Mouton

Engineering Support Manager Air Quality Assessment Division

	;		
	- <sup>*</sup>		
		•	
$(x_1, x_2, x_3, \dots, x_n) = (x_1, x_2, \dots, x_n) = (x_1, x_2, \dots, x_n)$			
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PEGGY M. HATCH ///

### State of Louisiana

### DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

Certified Mail No. 7005 0390 0001 6881 0910

Activity No.: PER20100003 Agency Interest No. 1314

Mr. Daniel Tate Plant Manager Rhodia Inc. PO Box 828 Baton Rouge I.A. 70

Baton Rouge, LA 70821-0828

RE: Part-70 Operating Permit Rhodia Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Tate:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this <u>75</u> day of <u>Mpnl</u>, 2011.

Permit No.: 2184-V2

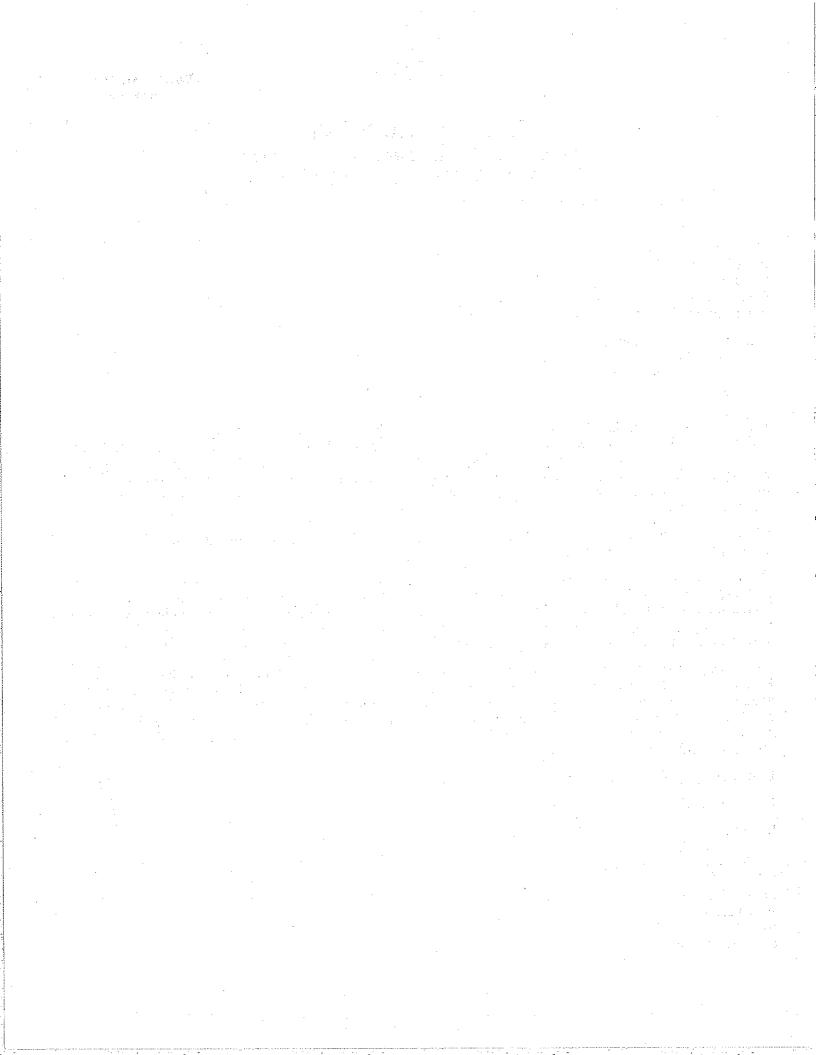
Sincerely,

SI Phillips

Sam L. Phillips Assistant Secretary

SLP:dhb

c: EPA Region VI



# CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

#### I. Background

Rhodia Inc. operates the CATHYVAL Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces fine specialty organic chemicals that are used in food, fragrances, pharmaceuticals, and as laboratory reagents. The CATHYVAL Plant currently operates under Title V Permit No. 2184-V1, issued on August 20, 2007, and amended on September 4, 2007.

#### II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Rhodia Inc. on February 11, 2010 requesting a Part 70 operating permit renewal/modification. An addendum to the application was received on August 6, 2010.

#### III. Description

The CATHYVAL Plant consists of the Cathy, Daphne, and Vanessa production units, and a Wastewater Treatment Unit. Steam to operate these units is supplied by the waste heat boilers of the Sulfuric Acid Plant.

#### Cathy Unit

The Cathy Unit produces pyrocatechol and hydroquinone for use as a raw material at the Daphne Unit and hydroquinone (HQ) for outside sales. Pyrocatechol and hydroquinone are synthesized using a proprietary Rhodia hydroxylation process. Phenol and hydrogen peroxide react to form pyrocatechol and hydroquinone. The reaction mixture is dissolved in a light organic solvent in the extraction section. Unreacted phenol is removed using distillation and recycled back to the process. Waste acids and salts from the reaction are extracted in an aqueous phase and sent to waste water treatment. Recovered phenol is recycled and the tars are sent to the acid plant to be burned as fuel. Products (hydroquinone and pyrocatechol) are then separated in the splitter. Finally, pyrocatechol is transferred to storage in molten form or flaked and packaged and hydroquinone is crystallized, centrifuged, dried, and packaged. Pyrocatechol may also be mixed with a solvent and shipped as a liquid for certain customers.

#### Daphne Unit

The Daphne unit synthesizes guaiacol and guetol using a proprietary Rhodia process. Production of guaiacol and guetol from pyrocatechol is similar except that the guetol process

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

uses ethyl chloride as a reactant, whereas the guaiacol process uses methyl chloride. Veratrole and o-diethoxybenzene (ODEB) are produced as co-products for outside sales.

Guaiacol is produced by a methylation process using pyrocatechol, methyl chloride, and caustic in the presence of water and a light organic solvent. Guetol is produced by an ethylation process using pyrocatechol, ethyl chloride, and caustic in the presence of water and a light organic solvent. The phases are separated, and organics in the aqueous layer are then removed by solvent extraction. The residual aqueous layer is sent to the waste treatment unit. The recovered mixture of organics and solvent is distilled to recover and recycle the solvent. It is then further distilled to recover pure guaiacol/guetol and veratrole/ODEB. The pure guaiacol/guetol is sent to the Vanessa Unit, or shipped to external customers by bulk shipments or in drums. Veratrole and ODEB are purified by washing and further distillation then shipped to external customers by bulk shipments or in drums. Heavy impurities from the distillations are sent to the acid plant to be burned as fuel.

The Daphne Unit operates in series with the Cathy and Vanessa Units, and runs more efficiently. Due to this higher efficiency, Rhodia may also utilize the Daphne Unit to manufacture para-methoxy-phenol (PMP) in place of guaiacol/guetol and veratrole/ODEB.

PMP and its byproduct para-di-methoxy-benzene (PDMB) are manufactured by methylation of HQ using methyl chloride. HQ produced by the Cathy Unit, or received from external suppliers, is used as a feedstock. The separation steps are similar to the guaiacol/guetol process. No purification of PDMB is necessary. PMP is shipped in bulk as a molten liquid.

#### Vanessa Unit

The Vanessa Unit synthesizes vanillin and ethyl vanillin utilizing a proprietary Rhodia process. In vanillin production, guaiacol reacts with sodium hydroxide to form sodium guiacolate. Sodium guiacolate is then condensed with glyoxylic acid to form sodium mandelate in the condensation section. In the extraction/distillation section, the unreacted guaiacol is then extracted with solvent. The organic phase is distilled and the aqueous phase is stripped to recover the guaiacol and solvent for recycle. In the oxidation area, the aqueous mandelate solution is reacted with air and caustic in the presence of a catalyst to form vanillate. The aqueous vanillate solution is neutralized to form the product vanillin. The vanillin is then extracted with solvent. After recovery and recycling of the solvent, the vanillin is purified by washing and distillation and converted to the solid product by flaking or crystallizing and drying. Crystallized product is packaged into boxes or other containers. Flaked product is packaged in super-sacks. Ethyl vanillin is manufactured through the same series of steps by substituting guetol for guaiacol.

CATHYVAL Plant
Agency Interest No.: 1314
Rhodia Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

#### Wastewater Treatment Unit

All liquid effluents from the CATHYVAL Plant are routed to the Wastewater Treatment Unit via Tank 28 and/or Tank 29. The effluent is sent to the aeration basins where it is treated aerobically with an activated sludge process. The sludge is then separated from the liquid effluent in the clarifiers and solid-liquid separation equipment.

The clarified effluent is then discharged to the Mississippi River. All stormwater from the CATHYVAL Plant will be discharged to the Mississippi River after it has been flushed into Tank 29 (EQT 119) to prevent potential contamination (oil, zinc, etc.) from reaching the river. The stored stormwater from Tank 29 (EQT 119) is used as dilution water and treated as normal effluent into the aerobic/activated sludge process.

#### **Air Emissions Control Measures**

The primary emissions from the CATHYVAL Plant process are volatile organic compounds (VOCs), some of which are HAP/TAPs, and particulate matter (PM<sub>10</sub>). There is a small amount of natural gas combustion emissions as well. The CATHYVAL plant is not a major Title V source on its own, but is subject to Title V permitting due to its co-location with the Sulfuric Acid Plant.

Any vent streams containing the chlorinated hydrocarbons methyl chloride and ethyl chloride are vented conveyed to the sulfuric acid regeneration furnaces in the acid plant (primarily Sulfuric Acid Unit No. 1, EPN 3, with Unit No. 2, EPN 2, as a backup) for combustion and HCl control. Non-chlorinated vent streams containing light organics are controlled by condensers and scrubbers. The effluent from the scrubbers is either recycled within the process or sent to the wastewater treatment unit. Some of the water sent to the wastewater treatment unit is first sent to a stripper, where organics are recovered and recycled to the process. The scrubbers are equipped with a continuous water flow meter as well as a high pressure drop alarm to ensure proper performance.

#### **Modifications**

With this permit modification/renewal, Rhodia accomplishes the following changes:

- Add Analyzer Vents to the Insignificant Activities list.
- Update the calculations for the cooling towers (EQT0125).
- Add the tote loading of o-vanillin into the General Condition XVII list.
- Add Predephenoling Vent Condenser E-318 (EQT0289) and Detarring Condenser E-506 (EQT0290) to the equipment list.
- Delete EQT0108 Pre-Coat Bag Dump Station Baghouse S-631 for D-628
- Alter the Specific Requirements section as follows:

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

- o Add requirements for the scrubbers (EQTs 009, 0015, 0019, 0021, 0028, 0031, 0040, 0045, 0051, 0052, 0056, 0076, 0082, 0089, 0094) to state that the scrubbers must operate at all times, except for specific named scenarios for which there are no emissions or for which there are minimal emissions that have been quantified and included in the permit emission limits.
- Add the following requirement to EQTs 0076, 0082, and 0094: "Up to 16 hours per year, if/when the scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation."
- o Add a requirement to the condensers EQT0289 & 0251 allowing the condensers to stop operation if the equipment vented to them is emptied of organic contents and washed or either emits only breathing losses or has a valve line that can be closed.
- Move the specific requirement contained in both EQT0082 Scrubber C-319 and EQT0089 Scrubber C-402 regarding the maximum water temperature to EQT0289 Condenser E-318 and EQT0251 Condenser E-401 respectively.
- o Revise the specific requirement in EQT0087 to note that the 98% control standard per LAC 33:III.2115 does not apply when the unit is shutdown.

The addendum from Rhodia that was received by LDEQ on August 6, 2010, accomplishes the follow additional changes:

- Reduce minimum scrubber water flow rate for scrubber C-419 (EQT 0028) from 42.0 gpm to 18.0 gpm while increasing VOC emission rate from 0.08 to 0.53 tpy. The minimal increase in air emissions from this scrubber (overall plant HAP emissions decrease with this permit) results in significant reduction in water and energy consumption.
- Correct an error in the Tanks program inputs for EQT0201. Total VOCs increase from 0.03 to 0.04 tpy.
- Include an improved (lower) estimate of maximum hourly emissions from EIQ0301 Scrubber C-209.
- Correct the natural gas heating value for heaters EQT0113 (EPN:315A) and EQT0114 (EPN:315B) from 1000 to 1040 Btu/scf, resulting in a slight decrease in permitted emission rates.
- Correct a typo in the WWT emission calculations; there is no resulting change to emission rates.
- Add two fire pump diesel engines EQT286 (M-8A) and EQT287 with requirements for 40 CFR 63 Subpart ZZZZ, LAC 33:III.1101.B and LAC 33:III.1311.C. The engines are grouped together in GRP0022.
- Add one emergency diesel generator, EQT288 (M-9)

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Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	Before	<u>After</u>	<u>Change</u>
$PM_{10}$	7.74	1.98	-5.76
SO <sub>2</sub>	0.03	0.16	+0.13
$NO_X$	4.41	6.19	+1.78
CO	3.70	3.98	+0.28
VOC *	25.02	27.09	+2.07

*VOC LAC 33:III	Chapter 51	Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Ethyl Chloride	0.12	0.12	-
Hydroquinone	1.13	0.36	-0.77
Methanol	3.50	3.38	-0.12
Methyl Chloride	0.23	0.23	-
Methyl isobutyl ketone	9.74	9.46	-0.28
Phenol	0.49	0.52	+0.03
Pyrocatechol	0.72	0.46	-0.26
Total HAPs	15.93	14.53	-1.40

#### IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD), does not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. The facility is not a major source of hazardous air pollutants (HAPs).

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Rhodia Inc.
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#### V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

#### VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on March 3, 2011. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on February 28, 2011. The draft permit was also submitted to US EPA Region VI on February 22, 2011. No comments were received.

#### VII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions for this modification. However, in March 2005, modeling was performed. The results are shown below.

Dispersion Model(s) Used: Unknown

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

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Pollutant	Time Period	Calculated Maximum	Louisiana Toxic Air
	•	Ground Level	Pollutant Ambient Air
		Concentration	Quality Standard or
			(National Ambient Air
			Quality Standard
			{NAAQS})
MIBK	8-hour	323 μg/mg	4880

#### VIII. General Condition XVII Activities

#### Emission Rates - tons

XX7 T A 42 24	70.76	0.0	NIO	00	WOO		
Work Activity	PM <sub>10</sub>	$SO_2$	$NO_X$	CO	VOC	OI	her
Collecting 220 process samples/day for			[		0.01	PC	< 0.01
quality assurance in 4 oz bottles and						НQ	< 0.01
assuming that a max of 1% is emitted to						Phenol	< 0.01
the atmosphere.						1	
						MIBK	< 0.01
						MeOH	< 0.01
						EtCl	< 0.01
						MeCl	< 0.01
Drum Loading, unloading, and heating					0.22		
Phenol melting					0.02	Phenol	0.02
Maintenance activities including:					0.25	PC	0.03
Opening/removing pumps, compressors,						но	0.03
instruments, valves, vents, and piping;						Phenol	0.03
Vessel/equipment/tank truck/ISO							
container/rail car openings; Filter and		;			-	MIBK	0.03
strainer change-outs; Miscellaneous						MeOH	0.03
equipment cleaning; Nitrogen/steam/air						EtCl	0.03
clearing of equipment and lines; Waste handling/re-packaging						MeCl	0.03
Temporary storage of materials in tank					0.05	PC	0.03
trucks or ISO containers						НQ	<0.01
Portable Diesel Water Pump(s)	0.15	0.14	2.05	0.44	0.17		
Fugitive dust	0.05						
Tote Loading of o-Vanillin					0.07		

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#### IX. Insignificant Activities

ID No.:	Description	Physical/Operating	Citation
٠.	Defoamer for Tars Process	55 gallon drums	LAC 33:III.501.B.5.A.2
	Defoamer for WWTU	55 gallon drums	LAC 33:III.501.B.5.A.2
	Polymer for WWTU – Vulcan 4864	250 gallon totes	LAC 33:III.501 B.5.A.2
D-309X	Clarifier Polymer Feed Tank	1050 gallons	LAC 33:III.501.B.5.A.3
D-407X	Filter Polymer Feed Tank	1690 gallons	LAC 33:III.501.B.5.A.3
D-317X	Polymer Makeup Tank	880 gallons	LAC 33:III.501.B.5.A.3
D-320	Clarifier Floating Layer Tank	750 gallons .	LAC 33:III.501.B.5.A.3
D-323	Clarifier Underflow Tank	3170 gallons	LAC 33:III.501.B.5.A.3
D-316	Effluent Pump Tank	4300 gallons	LAC 33:III.501.B.5.A.3
D-420	Filtrate Tank	1260 gallons	LAC 33:III.501.B.5.A.3
C-104	Perchloric Acid Tank, P&ID F103	Vents to Y-132	LAC 33:III.501.B.5.A.4
D-101	H <sub>2</sub> O <sub>2</sub> Tank P&ID F102	Vents to Y-120V	LAC 33:III.501.B.5.A.4
D-102	H <sub>2</sub> O <sub>2</sub> Tank P&ID F102	Vents to Y-121V	LAC 33:III.501.B.5.A.4
D-106	Polyphosphoric Acid Tank, P&ID F103	Vents to Y-136	LAC 33:III.501.B.5.A.4
D-605	Metabisulfate Injection Tank, P&ID F601	Vents to atmosphere	LAC 33:III.501.B.5.A.4
D-664	Oxalic Acid Injection Drum	Vents to atmosphere	LAC 33:III.501.B.5.A.4
	4 Laboratory Vents	N/A	LAC 33:III.501.B.5.A.6
	Analyzer Vents	N/A	LAC 33:III.501.B.5.A.9
D-186	Vanessa Caustic Storage	100,900 gallons	LAC 33:III.501.B.5.B.40
D-305	Cathy Caustic Storage, P&ID F-302	1200 gallons	LAC 33:III.501.B.5.B.40
C-210	Daphne Caustic Storage	1200 gallons	LAC 33:III.501.B.5.B.40
C-243	Sulfuric Acid Dilution Tank	958 gallons	LAC 33:III.501.B.5.D

#### CATHYVAL Plant Agency Interest No.: 1314

#### Rhodia Inc.

X.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					· · · · · · · · · · · · · · · · · · ·					···		
				· · · · · · · · · · · · · · · · · · ·				LAC 3	3:III. C	hapter						412-1	<del></del>	
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	<del></del>	2115	2147	2149	2153	9	11	51	56	59*
UNF01	CATHYVAL Plant	1							1					1	1	1	1	1
	101 - LIGHTS TANK FARM SCRUBBER						2				2	2						
EQT 9	C-165														ļ			
EQT 10						1												
EQT 11	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)					1												
EQT 12	D-152 - SOLVENT 2 TANK (MIBK STORAGE)				<u></u>	1												
EQT 13	D-153 - SOLVENT 2 TANK (MIBK STORAGE)					1 .												
EQT 14						1												
	102 - HEAVIES TANK FARM SCRUBBER						2				2	2						
EQT 15											,							
EQT 16	D-107 (Vanessa) - GUAIACOL STORAGE TANK					1												
EQT 17	D-111 (Vanessa) - GUETOL STORAGE TANK					1												
EQT 18	D-113 - 50% GLYOXYLIC ACID STORAGE TANK					1												
EQT 19	103 - CONDENSATION SCRUBBER C-201										2	2						
EQT 20	C-216 - GUAIACOL RECYCLE TANK					1												

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# Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana X. Applicable Louisiana and Federal Air Quality Requirements LAC 33:III. Chapter

Χ.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements						w					·		
								LAC 3	3:III. C	hapter								
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT 21	104 - SOLVENT 1 VENT SCRUBBER C-248									ĺ	2	2						
EQT 22	C-236 - NEUTRALIZATION SURGE TANK				·	1					,							
EQT 23	C-240 - EXTRACTOR TAILS UPSET TANK					1							-					
EQT 24	C-243 - EXTRACTOR 1 TAILS SAFETY DECANTER									1								5.
EQT 25	C-244 - MANDELATE SURGE TANK					1												
EQT 26	C-249 - SOLVENT 1 SURGE TANK					1												
EQT 27	C-247 - SOLVENT 1 WASHING SAFETY DECANTER							÷		1								
EQT 28	105 - OXIDATION SCRUBBER C- 419										2							
EQT 29	C-409 - MANDELATE SURGE TANK					1	*	·		·								
EQT 30	D-417 - OXIDATION SURGE TANK					1												
EQT 31	106 - VANILLIN EXTRACTION SCRUBBER C-427					1				1	2	2			<del></del>			
EQT 32	C-421 - SOLVENT 2 SURGE TANK					1												
EQT 33	C-430 - SOLVENT 2 DECANTER				·					1								
EQT 34	C-432 - EXTRACTION 2 DRAIN TANK					1												
EQT 35	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER									1								

## **CATHYVAL Plant** Agency Interest No.: 1314 Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

X.	Applicable Louisiana and Fed	leral Air	Quality	Requir	ements													
						-		LAC 3	3:III. Cl	napter	<del>-2</del>			<del></del>		***************************************		
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	<del> </del>	2113		2147	2149	2153	9	11	51	56	59*
EQT 36	C-441 - AQUEOUS PHASE SURGE TANK					1												
EQT 37	C-501 - SOLVENT 2 DISTILLATION SURGE TANK					1												
EQT 38	C-558 - AQUEOUS EFFLUENTS TANK					1												
EQT 39	C-575 - SOLVENT 2 RECOVERY DECANTER				,					1								
EQT 40	107 DISTILLATION SCRUBBER C-557									***********	2	2						
EQT 41	C-535 - TARS SURGE TANK					1												
EQT 42	C-616 - FLAKER SURGE TANK					1												
EQT 43	C-648 - RECYCLE PRODUCT HOPPER MELTER									1								
EQT 44	C-655 - MELTER SURGE TANK					1								<del>                                     </del>				
EQT 45	108 - CRYSTALLIZATION SCRUBBER C-624					1					2	2						
	C-541 - METHANOL WASHING DRUM									1								
EQT 46										•								
EQT 47	C-801 - SOLVENT 3 RECOVERY FEED TANK					1												
EQT 48	C-603 - DISOLVER									1								
EQT 49	C-606 - VACUUM CRYSTALLIZER									1							·	
EQT 50	C-617 - CENTRIFUGE SURGE TANK					1												

#### **CATHYVAL Plant**

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#### Rhodia Inc.

X.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements										•			
								LAC 3	3:III. C	hapter				~	***************************************			
ID No.:.	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113		2147	2149	2153	9	11	51	56	59*
EQT 51	109 - BAGHOUSE FILTER/SCRUBBER C-704		1	2													·	
EQT 52	201 - TANK FARM SCRUBBER C- 146						2				2	2			<del></del>			
EQT 53	D-111 (Daphne) - PYROCATECHOL STORAGE TANK			_		1												
EQT 54	D-128 - TARS STORAGE TANK					1												
EQT 55	D-141 - VERATROLE STORAGE TANK				·	1												
EQT 56	202 - VENT SCRUBBER C-685										2	2						
EQT 57	C-201 - PC DISSOLUTION TANK											1						
EQT 58	C-553 - GUAIACOL DISTILLATION FEED TANK					1												
EQT 59	C-561 - RECYCLE PROCESS WATER TANK					1												
EQT 60	C-603 - GUAIACOL DISTILLATION TANK											1						
EQT 61	C-615 - TARS RECEIVER					1												
EQT 62	C-645 - PMDB RECEIVER					1							ļ					
EQT 63	C-651 - PC RECEIVER					1												
EQT 64	C-655 - GUAIACOL LT. ENDS RECEIVER					1												
EQT 65	C-660 - INTERS /VERATROLE RECEIVER					1												
EQT 66	C-665 - SECOND RECEIVER					1												

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X.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements							-						
								LAC 3	3:III. Cl	napter								
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113		2147	2149	2153	9	11	51	56	59*
EQT 67	C-670 - END OF CAMPAIGN RECEIVER					1												
EQT 68	C-675 - GUAIACOL RECEIVER					1												
EQT 69	C-701 - CRUDE VERATROLE WASH TANK											1						
EQT 70						1												
EQT 71	C-710 - CAUSTIC WASH RECEIVER					1	·											
EQT 72	C-751 - VERATROLE DISTILLATION KETTLE											1						
EQT 73	C-765 - LT. ENDS RECEIVER			·		1					······································							***************************************
EQT 74	C-770 - DISTILLED VERATROLE RECEIVER					1												
EQT 75	203 - BAGHOUSE FOR HQ HANDLING		1	2												-		
EQT 76	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)										2	2						
EQT 77	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM									1								
EQT 78	C-416 - PREDEPHENOL REFLUX DRUM									1								
EQT 79	C-508 - VERTICAL TAR DILUTER									1								
EQT 80	C-530 - DISTILLATION DRAIN TANK									1								
EQT 81	C-532 - TAILS SURGE DRUM									1								

#### **CATHYVAL Plant**

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#### Rhodia Inc.

Χ.	Applicable Louisiana and Fed	leral Air	Quality	Requir	ements								*****		·			
								LAC 3	3:III. C	hapter			·					
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT 82	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)			-						1	2	2						
·EQT 83	C-113 - PHENOL UNLOADING TANK						٠.			1								
EQT 84	D-107 - WASHWATER TANK					1												
EQT 85	D-111 - PHENOL MAKE-UP TANK					1												
EQT 86	D-115 - WASHWATER/GUAIACOL TANK					1											-	
EQT 87	D-315 - RAFFINATE TANK									1								
EQT 88	D-204 - RECYCLE PHENOL TANK									1								
	303 - IPE SOLVENT VENT SCRUBBER										1	2						
EQT 89	C-402 (P&I.D. F402)																	
EQT 90	C-320 - IPE STORAGE TANK									-1								
EQT 91	C-308 - IPE SETTLER									1								
EQT 92	C-311 - WASHWATER DRUM									1					······································			
EQT 93	C-322 - ETHER DRAIN TANK		·							1								
	304 - PC FLAKER VENT SCRUBBER										2	2						
EQT 94	C-561 (P&I.D. F508)																	
EQT 95	C-551 - PC RECEIVING DRUM									1								
EQT 96	C-563 - PC FLAKER FEED TANK		٠.							1								

#### **CATHYVAL Plant**

## Agency Interest No.: 1314 Rhodia Inc.

X.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements					***	<del></del>	******		**			·	
							<b>****</b>	LAC 3	3:III. C	hapter	:: <del></del>							
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	<del></del>	2147	2149	2153	9	11	51	56	59*
EQT 97	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)							,			2	2						
EQT 98	C-650 - REFLUX SURGE DRUM								-	1							<del> </del>	
EQT 99	D-607 - HQ DISSOLVER TANK									1								<u> </u>
EQT100	D-610 - HQ SURGE TANK			·						1							<del>                                     </del>	<del> </del>
EQT101	D-612 - CARBON TREATER TANK									. 1								
EQT102	D-632 - CRYSTALLIZATION TANK									1								
EQT103	D-652 - MOTHER LIQUOR SURGE TANK									1								
EQT104										1								
EQT105	D-657 - MOTHER LIQUOR SURGE DRUM									1								
EQT106			1	2	<i></i>						,					,		
EQT107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)		1	2								*						
EQT109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)		1	2														
EQT110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)		1	2														
EQT111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)		1	2														

#### **CATHYVAL Plant**

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X.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements			:						:				
								LAC 3	3:III. C	hapter								-
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT112			1	2														-
EQT113	315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)				1										1			
EQT114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)				1										1			
EQT115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625		1	2														
EQT116	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y- 760X (P&I.D. F703)		i	2														
GRP014	EMISSIONS CAP – WW TREATMENT PLANT												1					
EQT118																		
EQT119	401B - Stormwater Tank NO. 29 (P&I.D. F101)																	
EQT120	401C - TANK D-197																	
EQT121	402A - WEST AERATION BASIN D210													-				
EQT122	402B - EAST AERATION BASIN D213 (P&I.D. F201)																	
EQT123	402C - WEST CLARIFIER D301 (P&I.D. F302)					1 2												
EQT124	402D - EAST CLARIFIER D304 (P&I.D. F302)																	

#### CATHYVAL Plant Agency Interest No.: 1314

### Rhodia Inc.

X.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements		<del></del>											
					<del> </del>		ļ	LAC 3	3:III. C	hanter		758						<u></u>
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	T	2147	2149	2153	9	11	51	56	59*
EQT125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)		1	2											11		30	100
EQT126													2	$\vdash$				ļ —
EQT127					·	1	<del></del>						-					
EQT128									·			1						
EQT129	C-401 - AQUEOUS PHASE SURGE TANK					1												
EQT130						1			,									
EQT131	C-461 - AQUEOUS EFFLUENT TANK	·		_		1		,		,								
EQT132	C-521 - ORGANIC PHASE SURGE TANKC					1		, , ,										
EQT133	C-132 - MeCl STORAGE TANK	·				1				<u></u>								
EQT134			*****			1					77.00							<u> </u>
EQT135	C-301 - ACIDIFICATION/DECANTATION TANK		·					V				1						
EQT136	C-503 - DEETHERATION IPE DECANTER									1						***************************************		
EQT137	D-681 - SCREENER RESIDUE DISSOLVER									1		,						
EQT139	110 - HIGH PURITY PC MIXING VESSEL						2			1	•							
EQT188	C-202 - PREMIXING REACTOR									1						· · · · · · · · · · · · · · · · · · ·		

#### CATHYVAL Plant

#### Agency Interest No.: 1314

#### Rhodia Inc.

Χ.	Applicable Louisiana and Fed	ieral Air	Quality	Requir	ements	·												
			<del> •</del>	<del></del>				LAC 3	3:III. Cl	hapter		<del> </del>						
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT189	C-207 - VERATROLE STRIPPER									1								
EQT190	C-217 - NO. 1 CONDENSATION RTR.					:				1								
EQT191	C-219 - NO. 2 CONDENSATION RTR.								-	1								
EQT192	C-221 - NO. 3 CONDENSATION RTR.									1								
EQT193	C-223 - NO. 4 CONDENSATION RTR.									1								
EQT194	C-225 - NO. 5 CONDENSATION RTR.							:		1								
EQT195	C-227 - POLISHING REACTOR (RTR)					4.		,		1								
EQT196	C-241 - GUAIACOL EXTRACTION COLUMN									1							·	
EQT197	C-245 - SOLVENT 1 WASHING COLUMN									1								
EQT198	C-301 - GUAIACOL REVOVERY COLUMN	·	,							1								
EQT199	C-306 - GUAIACOL/TARS SEPARATOR							ı		1								
EQT200	C-312 - SOLVENT 1 STRIPPER DECANTER									1							,	
EQT201	C-314 - SOLVENT 1 STRIPPER					<u> </u>				1	,							
EQT202	C-316 - SOLVENT 1 COLD TRAP TANK									1								
EQT203	C-320 - GUAIACOL DISTILLATION REFLUX DRUM									1								

#### **CATHYVAL Plant**

## Agency Interest No.: 1314 Rhodia Inc.

X.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements			<del></del>				-					•	
								LAC 3	3:III. CI	hapter								
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT204	C-322X - SOLVENT 1 VACUUM PACKAGE SEPARATOR									1								
EQT205	H-317 - VACUUM SYSTEM									1								
EQT206	C-407 - OXIDATION REACTOR									1				ŀ				
EQT207	C-416 - OXIDATION COLUMN	- "								1								
EQT208	C-429 - CO2 SEPARATOR									1								
EQT209	C-435 - VANILLIN EXTRACTION COLUMN TANK									1								
EQT210	C-440 - SOLVENT 2 WASHING COLUMN	,								1								
EQT211	C-504 - VANILLIN/ SOLVENT 2 ATM. DISTILLATION COLUMN									1								
EQT212	C-507 - VANILLIN/ SOLVENT 2 VACUUM DISTILLATION COLUMN					-				1								
EQT213	C-516 - SOLVENT 2 COLD TRAP									1								
EQT214	C-533X - SOLVENT 2 VACUUM PACKAGE SEPARATOR									1								
EQT215	C-565 - SOLVENT 2 RECOVERY COLUMN									I								
EQT216	C-568 - SOLVENT 2 RECOVERY COLUMN									1								
EQT217	E-428 - CONDENSER						·			1								
EQT218	H-520 - VACUUM SYSTEM									1								
EQT219	C-525 - TARS REMOVAL COLUMN									1								
EQT220	C-529 - TARS BY-PASS									1								

#### **CATHYVAL Plant**

## Agency Interest No.: 1314 Rhodia Inc.

X.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements													•
								LAC 3	3:III. C	hapter								
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	<del></del>	2115	2147	2149	2153	9	11	51	56	59*
EQT221	C-545 - LIGHTS REMOVAL COLUMN		-							1								
EQT222	C-555A/B - VANILLIN COLD TRAPS									1								
EQT223	C-562 - VANILLIN PURIFICATION VACUUM PACKAGE SEPARATOR									1		:					·	
EQT224	H-556 - VACUUM SYSTEM				,					1								
EQT225	C-634X - DRYER SCRUBBER						***	,		1			·					
EQT226	C-637X - CRYSTALLIZATION VACUUM SEPARATOR									1								
EQT227	C-640 - DRYER									1		-				•		
EQT228	C-805 - SOLVENT 3 RECOVERY COLUMN			·					-	1								
EQT229	H-619 - VACUUM SYSTEM									1								
EQT230	Y-620 - CENTRIFUGE A									1								
EQT231	Y-621 - CENTRIFUGE B									1								
EQT232	Y-640 - DRYER		-				,			1								
EQT233	C-606 - GUAIACOL DISTILLATION COLUMN											1						- 25
EQT234	C-633X - GUAIACOL VACUUM PACKAGE SEPARATOR	:										1						
EQT235	C-678A/B - GUAIACOL DISTILLATION COLD TRAPS											1						
EQT236	C-754 - VERATROLE DISTILLATION COLUMN											1						

#### CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc.

X.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements													
	·				•	~		LAC 3	3:III. Cl	napter								
ID No.:	Description	1303.B	1311,B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	9	11	51	56	59*
EQT237	C-783X - VERATROLE VACUUM SEPARATOR									. / ***		1						
EQT238	C-787 - VERATROLE DISTILLATION COLD TRAPS			k								1						
EQT239	C-213 - FIRST RTR										1							
EQT240	C-215 - SECOND RTR										1							
EQT241	C-217 - THIRD RTR										1							
EQT242	C-219 - FOURTH RTR					·					1							
EQT243	C-231 - FIFTH RTR										1							
EQT244	C-501 - DETARRING COLUMN										1				······································			:
EQT245	C-521 - FINAL DEPHENOLING COLUMN						:				1					1.		
ЕQТ246	E-418 - PHENOL CONDENSER									·	1							
EQT247	H-524 - VACUUM SYSTEM		٠								1							
EQT248	C-301 - WATER STRIPPER							·			1							
EQT249	C-313 - EXTRACTION COLUMN						·				1							
EQT250											1							
EQT251	E-401 - SOLVENT VENT CONDENSER										1							
EQT252	C-536 - SPLITTER COLUMN (PC/HQ SEP)										1							
EQT253	H-545 - VACUUM SYSTEM										1							
EQT254	S-560 - PC FLAKER									1								
EQT255	C-251 - BATCH RTR											1						

#### CATHYVAL Plant Agency Interest No.: 1314

#### Rhodia Inc.

Χ.	Applicable Louisiana and Fed	eral Air	Quality	Requir	ements				-				• •		-			
						<del></del>	···	LAC 3	3:III. C	hapter	·		<del>~~</del>			YIRE	•	
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107		2113		2147	2149	2153	9	11	51	56	59*
EQT256	H-640 - VACUUM SYSTEM FOR CRYSTALLIZERS									• 1								
EQT257	C-451 - EXTRACTION COLUMN									1								
EQT258	C-501 - DEETHERATION COLMN				·	-				1								
EQT259	C-511 - DEETHERATION QUAIACOL DECANTER									1								
EQT260	C-551 - CRUDE GUAIACOL DEHYDRATION COLUMN									1								
EQT261	C-555 - WET GUAIACOL TANK					1												
EQT286	Fire-Water Pump G972A			1											1			
EQT287	Fire-Water Pump G972B		,	1								-			1			
EQT288	M-9 Emergency Diesel Generator for Daphne/Vanessa Sump			1											1			
EQT289	E-318 Predephenoling Vent Condenser									1	<del></del>							
EQT290	E-506 Detarring Condenser							, , , , , , , , , , , , , , , , , , , ,			1							
GRP022	Fire Pump Diesel Engines			1											1			
FUG1	F-6V - VANESSA FUGITIVE EMISSIONS	-						1					٠					
FUG4	F-6C - CATHY FUGITIVE EMISSIONS							1										
FUG5	F-6D - DAPHNE FUGITIVE EMISSIONS	·						1									,	

<sup>\*</sup> The regulations indicated above are State Only regulations.

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

#### KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
  - -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

#### **CATHYVAL Plant**

#### Agency Interest No.: 1314

#### Rhodia Inc.

<b>X.</b> A	Applicable Louisiana and	Fede	eral A	Air Qu	ality	Requi	remen	its	N							<del>:</del>					
					· · · · · · · · · · · · · · · · · · ·	40 (	CFR 60				T	40 C	FR 6	1		40 CFR	63		40 (	CFR	
ID No.:	Description	Α	K	Ka	Кb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
UNF01	CATHYVAL Plant	2 -					2	2	2	2	2	2		2	2	2	1	2	1	1	1
EQT 9	101 - LIGHTS TANK FARM SCRUBBER C-165					·															
EQT 10	D-148 - VANILLIN SOLVENT 1 TANK (METHANOL STORAGE)																				
EQT 11	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)																				
EQT 12	D-152 - SOLVENT 2 TANK (MIBK STORAGE)							. '		***************************************											
EQT 13	D-153 - SOLVENT 2 TANK (MIBK STORAGE)																				
EQT 14	D-169 - SOLVENT 3 TANK (METHANOL STORAGE)		-																		
EQT 15	102 - HEAVIES TANK FARM SCRUBBER C-187							·			1										
EQT 16	D-107 (Vanessa) - GUAIACOL STORAGE TANK				2				-	-											
EQT 17	D-111 (Vanessa) - GUETOL STORAGE TANK				2						-										
EQT 18	D-113 - 50% GLYOXYLIC ACID STORAGE TANK				2																
EQT 19	103 - CONDENSATION SCRUBBER C-201																				
EQT 20	C-216 - GUAIACOL										1				<u> </u>						

#### CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc.

						40 (	CFR 60					40 C	FR 6	1		40 CFR	. 63		40 (	FR	
ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	Α	М	V	FF	A	FFFF	ZZZZ	64	68	70	82
	RECYCLE TANK				Î													<u> </u>	<del> </del>		
EQT 21	104 - SOLVENT 1 VENT SCRUBBER C-248																				
EQT 22	C-236 - NEUTRALIZATION SURGE TANK				-																
EQT 23	C-240 - EXTRACTOR TAILS UPSET TANK																				
EQT 24	C-242 - EXTRACTOR 1 TAILS SAFETY DECANTER																				,
EQT 25	C-244 - MANDELATE SURGE TANK																				
EQT 26	C-249 - SOLVENT 1 SURGE TANK					,															
EQT 27	C-247 - SOLVENT 1 WASHING SAFETY DECANTER																			***************************************	
EQT 28	105 - OXIDATION SCRUBBER C-419																				
EQT 29	C-409 - MANDELATE SURGE TANK																				
EQT 30	C-417 - OXIDATION SURGE TANK				2						-										
EQT 31	106 - VANILLIN EXTRACTION SCRUBBER C-427																				
EQT 32	C-421 - SOLVENT 2 SURGE TANK C-421																		-		
EQT 33	C-430 - SOLVENT 2		-								T		T								

#### CATHYVAL Plant Agency Interest No.: 1314

#### Rhodia Inc.

<b>X.</b> A	Applicable Louisiana and	Fed	eral A	Air Qı	ality	Requi	remen	its													
						40 (	CFR 60					40 C	FR 6	51	<u> </u>	40 CFR	63		40 (	CFR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	DECANTER					·					1.		1	-	<del> </del>						
EQT 34	C-432 - EXTRACTION 2 DRAIN TANK																				
EQT 35	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER																				
EQT 36	C-441 - AQUEOUS PHASE SURGE TANK																				
EQT 37	C-501 - SOLVENT 2 DISTILLATION SURGE TANK																				
EQT 38	C-558 - AQUEOUS EFFLUENTS TANK C																				
EQT 39	C-575 - SOLVENT 2 RECOVERY DECANTER																				
EQT 40	107 DISTILLATION SCRUBBER C-557																				
EQT 41	C-535 - TARS SURGE TANK																				
EQT 42	C-616 - FLAKER SURGE TANK							***													
EQT 43	C-648 - RECYCLE PRODUCT HOPPER MELTER																				
EQT 44	C-655 - MELTER SURGE TANK				-																
EQT 45	108 - CRYSTALLIZATION SCRUBBER								· .												

#### CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc.

Х.	Applicable Louisiana and	Fede	eral A	Air Qu	ıality	Requi	remen	its				·		- CWron		770 ft to 1			-		n
						40 (	CFR 60					40 C	FR 6	1		40 CFR	63		40 (	CFR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	М	V.	FF	Α	FFFF	ZZZZ	64	68	70	82
EQT 46	C-541 - METHANOL WASHING DRUM C-541 (Vents through C- 801)										,	-									
EQT 47	C-801 - SOLVENT 3 RECOVERY FEED TANK				<u> </u>			7,111													
EQT 48	C-603 - DISOLVER																				
EQT 49	C-606 - VACUUM CRYSTALLIZER																				
EQT 50	C-617 - CENTRIFUGE SURGE TANK							V-100-10-10-10-10-10-10-10-10-10-10-10-10	:												
EQT 51	109 - BAGHOUSE FILTER/SCRUBBER C- 704																				
EQT 52	201 - TANK FARM SCRUBBER C-146																				
EQT 53	D-111 (Daphne) - PYROCATECHOL STORAGE TANK				2						1 2						-				
EQT 54	D-128 - TARS STORAGE TANK																				
EQT 55	D-141 - VERATROLE STORAGE TANK																				
EQT 56	202 - VENT SCRUBBER C-685																				
EQT 57	C-201 - PC DISSOLUTION TANK C-201																				
EQT 58	C-553 - GUAIACOL DISTILLATION FEED TANK																				

#### **CATHYVAL Plant**

#### Agency Interest No.: 1314

#### Rhodia Inc.

<b>X.</b> A	Applicable Louisiana and	Fed	eral A	Air Qu	ality	Requi	remer	its						-11.5% #1							
						40 (	CFR 60					40 C	FR 6	1	·	40 CFR	63		40 (	FR	
ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	Α	FFFF	ZZZZ	64	68	70	82
EQT 59	C-561 - RECYCLE PROCESS WATER TANK																				
EQT 60	C-603 - GUAIACOL DISTILLATION TANK																				
EQT 61	C-615 - TARS RECEIVER																				
EQT 62	C-645 - PMDB RECEIVER																				
EQT 63	C-651 - PC RECEIVER		<u> </u>														-				
EQT 64	C-655 - GUAIACOL LT. ENDS RECEIVER																				
EQT 65	C-660 - INTERS /VERATROLE RECEIVER				-																
EQT 66	C-665 - SECOND RECEIVER																				
EQT 67	C-670 - END OF CAMPAIGN RECEIVER																	:			
EQT 68	C-675 - GUAIACOL RECEIVER															•					
EQT 69	C-701 - CRUDE VERATROLE WASH TANK																	,			
EQT 70	C-705 - WATER GUAIACOLATE RECEIVER								-		1										
EQT 71	C-710 - CAUSTIC WASH RECEIVER																			***	
EQT 72	C-751 - VERATROLE DISTILLATION KETTLE																				

#### **CATHYVAL Plant**

## Agency Interest No.: 1314 Rhodia Inc.

Х.	Applicable Louisiana and	Fede	eral A	Air Qı	ality	Requi	remen	its													
						40 (	CFR 60					40 C	FR 6	1		40 CFR	. 63		40 (	CFR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT 73	C-765 - LT. ENDS RECEIVER																		-	, 0	02
EQT 74	C-770 - DISTILLED VERATROLE RECEIVER							*						-		7.00					
EQT 75	203 - BAGHOUSE FOR HQ HANDLING																				
EQT 76	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)																				
EQT 77	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223																				
EQT 78	C-416 - PREDEPHENOL REFLUX DRUM							***			<del> </del>						-			William I	
EQT 79	C-508 - VERTICAL TAR DILUTER									<del></del>											
EQT 80	C-530 - DISTILLATION DRAN TANK						·			•											
EQT 81	C-532 - TAILS SURGE DRUM C-													•							
EQT 82	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)																				
EQT 83	C-113 - PHENOL UNLOADING TANK											~===									
EQT 84	D-107 - WASHWATER TANK				2											<u> </u>					
EQT 85	D-111 - PHENOL MAKE- UP TANK				2					· · · · · · · · · · · · · · · · · · ·											

#### **CATHYVAL Plant**

#### Agency Interest No.: 1314

#### Rhodia Inc.

<b>X.</b> A	Applicable Louisiana and	red	eral /	Air Qu	iality	Kequii	remen	its													
						40 (	FR 60		,			40 C	FR 6	1		40 CFR	63		40 (	JFR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	Α	М	V	FF	Α	FFFF	ZZZZ	64	68	70	82
EQT 86	D-115 - WASHWATER/GUAIAC OL TANK				2																
EQT 87	D-315 - RAFFINATE TANK																			1 "	
EQT 88	D-204 - RECYCLE PHENOL TANK																			***************************************	
EQT 89	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)																				
EQT 90	C-320 - IPE STORAGE TANK			. `												<del> </del>					·
EQT 91	C-308 - IPE SETTLER																				
EQT 92	C-311 - WASHWATER DRUM																				
EQT 93	C-322 - ETHER DRAIN TANK					·															
EQT 94	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)																				
EQT 95	C-551 - PC RECEIVING DRUM																				
EQT 96	C-563 - PC FLAKER FEED TANK																				
EQT 97	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)						-					-						-			
EQT 98	C-650 - REFLUX SURGE			<u> </u>					<del>                                     </del>		1										

#### **CATHYVAL Plant**

#### Agency Interest No.: 1314

#### Rhodia Inc.

X. A	Applicable Louisiana and	Fede	eral A	Air Qu	ality	Requi	remer	its					***				· · · · · · · · · · · · · · · · · · ·				
						40 (	CFR 60					40 C	FR 6	51		40 CFR	63	<u> </u>	40 (	CFR	· · · · · · · · · · · · · · · · · · ·
ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	. A	M	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	DRUM			72.50						-			_							<del></del>	
EQT 99	D-607 - HQ DISSOLVER TANK																				
EQT100	D-610 - HQ SURGE TANK																	-	-		-
EQT101	D-612 - CARBON TREATER TANK							***									*				
EQT102	D-632 - CRYSTALLIZATION TANK																				
EQT103	D-652 - MOTHER LIQUOR SURGE TANK																		<u> </u>		
EQT104	D-653 - CONC. COLUMN FEED TANK																				
EQT105	D-657 - MOTHER LIQUOR SURGE DRUM			,																	
EQT106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601																				
EQT107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)												•								
EQT109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)																				
EQT110	311 - PC PACKAGING																	-			

#### **CATHYVAL Plant**

#### Agency Interest No.: 1314

#### Rhodia Inc.

<b>X.</b> A	Applicable Louisiana and	Fed	eral A	Air Qı	iality	Requi	remer	its								•					
		<u> </u>				40 (	CFR 60		V///142-1611		T	40 C	FR 6	51		40 CFR	. 63		40 (	CFR	
ID No.:	Description	A	K	Ka	Kb	VV	m	NNN	RRR	YYY	A	М	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	BAGHOUSE Y-731 (P&I.D. F703)																				
EQT111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)																				
EQT112	313 - HQ REWORK DUMPER BAGHOUSE S- 693 FOR D607 (P&I.D. F602)																				-
EQT113	315A - FLUID HEATER F- 962 (BACK-UP) (P&I.D. F927)																				
EQT114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)					-											-				
EQT115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625																				
EQT116	317 - VACUUM CLEAN- UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)																				
GRP014	EMISSIONS CAP WW TREATMENT PLANT																				
EQT118	401A - WWT TANK NO. 28 (P&I.D. F101)																				
EQT119	401B - Stormwater Tank No. 29 (P&I.D. F101)														<del> </del>						
EQT120	401C - TANK D-197																				
EQT121	402A - WEST AERATION				-																

#### CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc.

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ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	М	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	BASIN D210														1						-
EQT122	402B - EAST AERATION BASIN D213 (P&I.D. F201)		-																		
EQT123	402C - WEST CLARIFIER D301 (P&I.D. F302)													- <del></del>							
EQT124	402D - EAST CLARIFIER D304 (P&I.D. F302)																				
EQT125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)											The state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the s					,				
EQT126	M-6 - CATHYVAL SUMPS																				
EQT127	C-101 - IPE SOLVENT STORAGE TANK																	,			
EQT128	C-351 - RAG LAYER DIVERTING TANK																				
EQT129	C-401 - AQUEOUS PHASE SURGE TANK																				
EQT130	C-352 - RAG LAYER SURGE TANK																				
EQT131	C-461 - AQUEOUS EFFLUENT TANK																				
EQT132	C-521 - ORGANIC PHASE SURGE TANKC																				
EQT133	C-132 - MeCl STORAGE TANK																				
EQT134	C-136 - EtCl STORAGE							<u> </u>	,			<u> </u>	1								

#### CATHYVAL Plant Agency Interest No.: 1314

#### Rhodia Inc.

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ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	TANK									*											
EQT135	C-301 - ACIDIFICATION/DECAN TATION TANK																				
EQT136	C-503 - DEETHERATION IPE DECANTER																				
EQT137	D-681 - SCREENER RESIDUE DISSOLVER																				
EQT139	110 - HIGH PURITY PC MIXING VESSEL											-									
EQT188	C-202 - PREMIXING REACTOR									·								-			
EQT189	C-207 - VERATROLE STRIPPER																				
EQT190	C-217 - NO. 1 CONDENSATION RTR.			·																	
EQT191	C-219 - NO. 2 CONDENSATION RTR.									*****											
EQT192	C-221 - NO. 3 CONDENSATION RTR.																				
EQT193	C-223 - NO. 4 CONDENSATION RTR.																				
EQT194	C-225 - NO. 5 CONDENSATION RTR.																				
EQT195	C-227 - POLISHING REACTOR (RTR)													***************************************							
EQT196	C-241 - GUAIACOL EXTRACTION COLUMN																				
EQT197	C-245 - SOLVENT 1 WASHING COLUMN			·																	

## **CATHYVAL Plant**

# Agency Interest No.: 1314 Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

<b>X.</b> A	Applicable Louisiana and	Fede	eral A	Air Qu	tality !	Requi	remen	its											*******		•••••
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ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	Α	М	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT198	C-301 - GUAIACOL REVOVERY COLUMN																				0.2
EQT199	C-306 - GUAIACOL/TARS SEPARATOR																				
EQT200	C-312 - SOLVENT 1 STRIPPER DECANTER								211.												
EQT201	C-314 - SOLVENT 1 STRIPPER															-					
EQT202	C-316 - SOLVENT 1 COLD TRAP TANK													-							
EQT203	C-320 - GUAIACOL DISTILLATION REFLUX DRUM				,																
EQT204	C-322X - SOLVENT 1 VACUUM PACKAGE SEPARATOR																				
EQT205	H-317 - VACUUM SYSTEM																				
EQT206	C-407 - OXIDATION REACTOR				-															,	
EQT207	C-416 - OXIDATION COLUMN								-							_					
EQT208	C-429 - CO2 SEPARATOR								1												·
EQT209	C-435 - VANILLIN EXTRACTION COLUMN TANK																				
EQT210	C-440 - SOLVENT 2 WASHING COLUMN																				
EQT211	C-504 - VANILLIN/ SOLVENT 2 ATM.											-									

#### **CATHYVAL Plant**

#### Agency Interest No.: 1314

#### Rhodia Inc.

<b>X.</b> A	Applicable Louisiana and	Fed	eral A	Air Qı	ıality	Requi	remer	its							=w·			. · · · · · · · · · · · · · · · · · · ·	*		
					······································	40 (	CFR 60	·	<u>-</u>		Ī	40 C	FR 6	1		40 CFR	63		40 (	CFR	i
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	М	V	FF	A	FFFF	ZZZZ	64	68	70	82
	DISTILLATION COLUMN			. "																	
EQT212	C-507 - VANILLIN/ SOLVENT 2 VACUUM DISTILLATION COLUMN				1.																
EQT213	C-516 - SOLVENT 2 COLD TRAP															,					
EQT214	C-533X - SOLVENT 2 VACUUM PACKAGE SEPARATOR				÷	-						:									
EQT215	C-565 - SOLVENT 2 RECOVERY COLUMN																				
EQT216	C-568 - SOLVENT 2 RECOVERY COLUMN																				
EQT217	E-428 - DONDENSER	T									†		İ								
EQT218	H-520 - VACUUM SYSTEM																				
EQT219	C-525 - TARS REMOVAL COLUMN										7										
EQT220	C-529 - TARS BY-PASS										T	·									
EQT221	C-545 - LIGHTS REMOVAL COLUMN									·											
EQT222	C-555A/B - VANILLIN COLD TRAPS																				
EQT223	C-562 - VANILLIN PURIFICATION VACUUM PACKAGE SEPARATOR																				
EQT224	H-556 - VACUUM		·								1										

#### CATHYVAL Plant

#### Agency Interest No.: 1314 Rhodia Inc.

<b>X.</b> A	Applicable Louisiana and	Fede	eral ,	Air Qı	ality	Requi	remer	ıts				**			<u> </u>				······································		
-						40 (	CFR 60	·				40 C	FR 6	1		40 CFR	. 63		40 (	CFR	
ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	Α	M	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	SYSTEM														-		<del>                                     </del>	-	<del> </del>		
EQT225	C-634X - DRYER SCRUBBER																				
EQT226	C-637X - CRYSTALLIZATION VACUUM SEPARATOR											,									
EQT227	C-640 - DRYER											<del> </del> -	-								$\vdash$
EQT228	C-805 - SOLVENT 3 RECOVERY COLUMN		-					****						-			-				
EQT229	H-619 - VACUUM SYSTEM												i								
EQT230	Y-620 - CENTRIFUGE A										1						<del> </del>		···		
EQT231	Y-621 - CENTRIFUGE B		· · · · · · · · · · · · · · · · · · ·				<u> </u>			····	<del>                                     </del>	<del> </del>						<del> </del>			<b></b>
EQT232	Y-640 - DRYER		1										<del> </del>		<del>                                     </del>	· · · · · ·	<del> </del>		<del> </del> -		$\vdash\vdash\vdash$
EQT233	C-606 - GUAIACOL DISTILLATION COLUMN						-														
EQT234	C-633X - GUAIACOL VAUUM PACKAGE SEPARATOR																				
EQT235	C-678A/B - GUAIACOL DISTILLATION COLD TRAPS									, *************************************											
EQT236	C-754 - VERATROLE DISTILLATION COLUMN	:																			
EQT237	C-783X - VERATROLE VACUUM SEPARATOR							1-00-						;							
EQT238	C-787 - VERATROLE DISTILLATION COLD								·												

#### **CATHYVAL Plant**

#### Agency Interest No.: 1314

#### Rhodia Inc.

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ID No.:	Description	Α	K	Ka	Кb	VV	III	NNN	RRR	YYY	A	M	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	TRAPS				1											·					
EQT239	C-213 - FIRST RTR		1																		
EQT240	C-215 - SECOND RTR																				
EQT241	C-217 - THIRD RTR																				
EQT242	C-219 - FOURTH RTR																				
EQT243	C-231 - FIFTH RTR																				
EQT244	C-501 - DETARRING COLUMN																				
EQT245	C-521 - FINAL DEPHENOLING COLUMN													-							
EQT246	E-418 - PHENOL CONDENSER																				
EQT247	H-524 - VACUUM SYSTEM																				
EQT248	C-301 - WATER STRIPPER													-							
EQT249	C-313 - EXTRACTION COLUMN																				
EQT250	C-405 - DEHYDRATION COLUMN																				
EQT251	E-401 - SOLVENT VENT CONDENSER																				
EQT252	C-536 - SPLITTER COLUMN (PC/HQ SEP)																		-		
EQT253	H-545 - VACUUM SYSTEM																				
EQT254	S-560 - PC FLAKER					-															
EQT255	C-251 - BATCH RTR										1		ļ								

#### CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc.

X. A	applicable Louisiana and	Fede	eral A	Air Qu	ıality	Requi	remer	its					• • • • • • • • • • • • • • • • • • • •				***************************************			Hard State of the	
						40 (	CFR 60					40 C	FR 6	61		40 CFR	. 63		40 (	CFR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	Α	М	V	FF	Α	FFFF	ZZZZ	64	68	70	82
EQT256	H-640 - VACUUM SYSTEM FOR CRYSTALLIZERS																				
EQT257	C-451 - EXTRACTION COLUMN		- increase and a second																		
EQT258	C-501 - DEETHERATION COLMN																				
EQT259	C-511 - DEETHERATION QUAIACOL DECANTER			_																	
EQT260	C-551 - CRUDE GUAIACOL DEHYDRATION COLUMN																				
EQT261	C-555 - WET GUAIACOL TANK																				
EQT286	Fire-Water Pump G972A																1	<del>                                     </del>	1		
EQT287	Fire-Water Pump G972B										-				1		Ī				
EQT288	M-9 Emergency Diesel Generator for Daphne/Vanessa Sump																1				
EQT289	E-318 Predephenoling Vent Condenser								-												
EQT290	E-506 Detarring Condenser				}						1										
GRP022	Fire Pump Diesel Engines									<u> </u>			ļ			<u> </u>	1				
FUG1	F-6V - VANESSA FUGITIVE EMISSIONS					2															
FUG4	F-6C - CATHY FUGITIVE EMISSIONS					1															
FUG5	F-6D - DAPHNE FUGITIVE EMISSIONS					2															

CATHYVAL Plant
Agency Interest No.: 1314
Rhodia Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

#### KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
- -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

ID No.	Requirement	Notes
UNF001	NESHAP Part 60 Subpart A - General Provision	DOES NOT APPLY. No Part 60 standards apply in the CathyVal Plant.
Facility	NSPS Part 60 Subpart III - Standards of Performance for VOC Emissions From the SOCMI Air Oxidation Unit Processes	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart NNN - Standards of Performance for VOC Emissions from SOCMI Distillation Operations.	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart RRR - Standards of Performance for VOC Emissions from SOCMI Reactor Processes	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart YYY - Volatile Organic Compound Emissions from the SOCMI Wastewater (Proposed)	DOES NOT APPLY. The Cathy, Daphne, and Vanessa units do not produce SOCMI chemicals as primary products. Therefore, they are not affected facilities under NSPS YYY. Hydroquinone is not the primary product of the unit.
	NESHAP Part 61 Subpart A - General Provisions	DOES NOT APPLY. No Part 61 standards apply in the CathyVal Plant.
	NESHAP Part 61 Subpart M - National Emission Standard for Asbestos	DOES NOT APPLY. The CathyVal Plant does not contain any asbestos.
	NESHAP Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations	DOES NOT APPLY. The CathyVal Plant does not contain any benzene.
	NESHAP Part 63 Subpart A - General Provisions.	DOES NOT APPLY. Rhodia is not a major source of HAPs.
	NESHAP Part 63 Subpart FFFF - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing	DOES NOT APPLY. Rhodia is not a major source of HAPs.
	NESHAP Part 64 - Compliance Assurance Monitoring	DOES NOT APPLY. No emission sources emit the major threshold amount of any pollutant.
	LAC 33:III Chapter 21, Subchapter L - Limiting Volatile Organic Compound Emissions from Cleanup Solvent Processing	DOES NOT APPLY. Rhodia does not have any affected cleaning operations according to the definition because the plant does not use solvents with vapor pressure >1.5 psia for cleaning operations.

#### **CATHYVAL Plant**

### Agency Interest No.: 1314 Rhodia Inc.

XI. Table 2. Explanat	ion for Exemption Status or Non-applicability of a Source	
UNF001 Facility (cont'd)	LAC 33:III Chapter 51 - Comprehensive Toxic Air Pollution Emissions Control Program [LAC 33:III.5109.A]	DOES NOT APPLY. The CathyVal plant does not emit any class I or class II TAPs for which sitewide emissions exceed the MER.
EQT009, EQT015 Tank Farm Scrubbers	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Vanessa is not a batch process.
EQT010, EQT011, EQT012, EQT013, EQT020, EQT022, EQT023, EQT025,		
EQT026, EQT029, EQT038, EQT041, EQT042, EQT044,		
EQT054, EQT055, EQT058 - EQT059, EQT61 - EQT68,		
EQT070, EQT071, EQT073, EQT074, EQT261 Tanks		
EQT019, EQT021,	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
EQT028, EQT031, EQT040, EQT045 Scrubbers	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III Chapter 21.Appendix A.
Scrubbers	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Vanessa is not a batch process.
EQT016 Storage Tank	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.

#### CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc.

XI. Table 2. Explanat	ion for Exemption Status or Non-applicability of a Source	
EQT16 Storage Tank (cont'd)	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Vapor pressure is less than 0.51 psia.
EQT017, EQT018		
Storage Tanks	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.
EQT024, EQT027, EQT035, EQT039, EQT043, EQT046, EQT048, EQT049, EQT077-EQT081, EQT083, EQT098, EQT090 - EQT093, EQT095, EQT096, EQT098-EQT105, EQT137, EQT188 - EQT 207, EQT209 - EQT 216, EQT218 - EQT232, EQT254, EQT256	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT. Emits less than 100 lb VOC in a 24-hour period.
EQT051	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33.III.1311.C]	EXEMPT. Editis less than 100 to VOC in a 24-notif period.  EXEMPT. PM <sub>10</sub> emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT139 High Purity PC Mixing Vessel	LAC 33:III Chapter 21 - VOC Loading  LAC 33:III Chapter 21 - Waste Gas Disposal	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.  EXEMPT. Emits less than 100 lb VOC in a 24-hour period.
EQT030, EQT053	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
Tanks	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Capacity is less than 39,900 gallons and vapor pressure is less than 2.2 psia.

#### **CATHYVAL Plant**

## Agency Interest No.: 1314 Rhodia Inc.

XI. Table 2. Explana	tion for Exemption Status or Non-applicability of a Source	
EQT052 Tank Farm Scrubber	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. Daphne does not produce any products on the list of SOCMI chemicals provided in LAC 33:III Chapter 21, Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Although some sections of the Daphne unit are batch operated, there are no batch process vents routed to this scrubber.
EQT056 Vent Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. Daphne does not produce any products on the list of SOCMI chemicals provided in LAC 33:III Chapter 21, Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. No control is required for the batch process vents venting to the scrubber because the pool of non-exempt batch process vents from the Daphne unit is controlled with overall 90% efficiency utilizing other control equipment.
EQT069, EQT072, EQT236, EQT237, EQT238 Tanks	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. Mass annual emission is less than 500 lb/yr. [LAC 33:III.2149.A.2.b]
EQT075 Baghouse	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33.III.1311.C]	EXEMPT. PM <sub>10</sub> emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT076 Vent Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. If it can be demonstrated that a TRE index value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT082 Tank Farm Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. There are no distillation or reactor vents routed to this scrubber. [LAC 33:III.2147.A]
EQT084 - EQT086	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQ1004 - EQ1000	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc.

XI. Table 2. Explana	tion for Exemption Status or Non-applicability of a Source	
EQT084 – EQT086 Tanks (cont'd)	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Vapor pressure is less than 0.51 psia.
EQT089 Vent Scrubber	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT094 Vent Scrubber	LAC 33:III Chapter 21 Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. If it can be demonstrated that a TRE index value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT097 Seal Pot	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. There are no distillation or reactor vents routed to this scrubber. [LAC 33:III.2147.A]
	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT106, EQT107, EQT109, EQT110, EQT111, EQT112, EQT115, EQT116 Baghouses	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33.III.1311.C]	EXEMPT. PM <sub>10</sub> emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT113, EQT114 Heaters	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide	EXEMPT. Emissions from this unit are less than 250 tpy; therefore, Rhodia requests exemption from this requirement per LAC 33:III.1503.C.
FUG004 Cathy Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	EXEMPT. If an affected facility produces heavy liquid chemicals only from heavy liquid feed of raw materials, then it is exempt from 40 CFR 60.482-1 through 40 CFR 60.482-10. [40 CFR 60.480(d)(3)]
FUG005 Daphne Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	DOES NOT APPLY. No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Daphne unit. [40 CFR 60.480]
FUG001 Vanessa Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	DOES NOT APPLY. No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Vanessa unit. [40 CFR 60.480]
EQT125 Cooling Towers	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33.III.1311.C]	EXEMPT. PM <sub>10</sub> emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explanat	tion for Exemption Status or Non-applicability of a Source	
EQT126 CATHYVAL Sumps	LAC 33:III Chapter 21 Subchapter M - Limiting VOC Emissions from Industrial Wastewater	EXEMPT. Any affected plant with an annual VOC loading in wastewater <10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B. [LAC 33:III.2153.G.1].
GRP014 Wastewater Treatment	LAC 33:III Chapter 21 Subchapter M - Limiting VOC Emissions from Industrial Wastewater	EXEMPT. Any affected plant with an annual VOC loading in wastewater <10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B. [LAC 33:III.2153.G.1]
EQT128 RAG layer Diverting Tank	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. Mass annual emission is less than 500 lb/yr. [LAC 33:III.2149.A.2.b]

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

#### **General Information**

#### Al ID: 1314 Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2

		Air - Title V Regular Perr	nit Renewal		
Also Known As:	ID	Name .	User Group		Start Date
	0840-00033	Rhodia Inc	CDS Number	<del></del>	08-05-2002
	LAD008161234	Rhodia Inc	Hazardous Waste Notification		11-17-1980
	PMT/PC	GPRA Baselines	Hazardous Waste Permitting		10-01-1997
	00861	Rhone Ponlenc Basic Chemical Co	Inactive & Abandoned Sites		11-23-1999
	LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites		11-23-1999
	LA0005223	LPDES #	LPDES Permit #		05-22-2003
		Priority 1 Emergency Site	Priority 1 Emergency Site		07-18-2006
	GL-349	Radiation General License	Radiation License Number		12-14-2000
	LA-338A-N01	Radioactive Material License	Radiation License Number		12-14-2000
	G-033-3198	. Site ID #	Solid Waste Facility No.		11-21-1999
	22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge		01-07-2002
	38329	Stauffer Chemical	TEMPO Merge		11-19-2001
	38427	Rhodia Inc	TEMPO Merge		01-11-2001
	70821STFFRAIRLI	TRI#	Toxic Release Inventory		07-19-2004
Physical Location:	1275 Airline Hwy Baton Rouge, LA 70805			Main FAX: Main Phone:	2253593722 2253593481
Mailing Address:	1275 Airline Hwy Baton Rouge, LA 70805				
Location of Front Gate:	30.509861 latitude, -91.1	8465 longitude, Coordinate Method: Lat.\Long DMS, Coo	rdinate Datum: NAD83		

Related People:

Name	Mailing Address	Phone (Type)	Relationship
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593443 (WF)	Accident Prevention Contact for
S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593742 (WP)	Accident Prevention Contact for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation Contact For
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation License Billing Party for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Water Billing Party for
Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Haz. Waste Billing Party for
J. Marcus Lewis	PO Box 828 Baton Rouge, LA 708210828	2253567111 (WP)	Responsible Official for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Air Permit Contact For
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Emission Inventory Facility Contact fo
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Emission Inventory Facility Contact for

Page 1 of 2

#### **General Information**

#### Al ID: 1314 Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Operates
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Owns
	Rhodia Inc	c/o CT Corporation System Baton Rouge, LA 70808		Agent of Service for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Emission Inventory Billing Party
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Air Billing Party for
NAIC Codes:	205499 All Other Decis Incom	anic Chemical Manufacturing		

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

oubject ite	m Inventory:					
ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval f		<u> </u>			THE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE STATE ST	
EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165				I	8760 hr/yr
	D-148 - D-148, VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	9120 gallons	11.08 MM gallons/yr	5.54 MM gallons/yr	VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	8760 hr/yr
	D-149 - D-149, ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	9120 gallons	11.08 MM gallons/yr	5.54 MM gallons/yr	MIBK STORAGE	8760 hr/yr
EQT 0012	D-152 - D-152, SOLVENT 2 TANK (MIBK STORAGE) D-152	15400 gallons	19.3 MM gallons/yr	9.65 MM gallons/yr	MIBK STORAGE	8760 hr/yr
	D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153	15400 gallons	19.3 MM gallons/yr	9.65 MM gallons/yr	MIBK STORAGE	8760 hr/yr
	D-169 - D-169, SOLVENT 3 TANK (METHANOL STORAGE) D-169	11200 gallons	5.08 MM gallons/yr	5.08 MM gallons/yr	METHANOL / ETHANOL	8760 hr/yr
	102 - 102, HEAVIES TANK FARM SCRUBBER C-187					8760 hr/yr
	D-107 (Vanessa) - D-107 (Vanessa), GUAIACOL STORAGE TANK D-107	45685 gallons	1.68 MM gallons/yr	1.68 MM gallons/yr		8760 hr/yr
EQT 0017	TANK D-111	31725 gallons	1.57 MM gallons/yr	1.57 MM gallons/yr		8760 hr/yr
	D-113 (Vanessa) - D-113 (Vanessa), GLYOXYLIC ACID STORAGE TANK D-113	31725 gallons				8760 hr/yr
	103 - 103, CONDENSATION SCRUBBER C-201					8760 hr/yr
	C-216 - C-216, GUAIACOL RECYCLE TANK C-216	780 gallons				8760 hr/yr
EQT 0021						8760 hr/yr
EQT 0022		1587 gallons				8760 hr/yr
EQT 0023		2570 gallons				8760 hr/yr
EQT 0024	C-243	900 gallons				8760 hr/yr
	C-244 - C-244, MANDELATE SURGE TANK C-244	2570 gallons				8760 hr/yr
	C-249 - C-249, SOLVENT 1 SURGE TANK C-249	1600 gallons				8760 hr/yr
,	C-247 - C-247, SOLVENT 1 WASHING SAFETY DECANTER C-247	225 gallons				8760 hr/yr
	105 - 105, OXIDATION SCRUBBER C-419					8760 hr/yr
	C-409 - C-409, MANDELATE SURGE TANK C-409	2575 gallons				8760 hr/yr
	C-417 - D-417, OXIDATION SURGE TANK D-417	22000 gallons				8760 hr/yr
	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427					8760 hr/yr
	C-421 - C-421, SOLVENT 2 SURGE TANK C-421	1785 gallons				8760 hr/yr
	C-430 - C-430, SOLVENT 2 DECANTER C-430	2000 gallons				8760 hr/yr
	C-432 - C-432, EXTRACTION 2 DRAIN TANK C-432	8000 gallons				8760 hr/yr
	C-434 - C-434, EXTRACTION 2 TAILS SAFETY DECANTER C-434	1400 gallons				8760 hr/yr
	C-441 - C-441, AQUEOUS PHASE SURGE TANK C-441	4100 gallons				8760 hr/yr
	C-501 - C-501, SOLVENT 2 DISTILLATION SURGE TANK C-501	8095 gallons				8760 hr/yr
	C-558 - C-558, AQUEOUS EFFLUENTS TANK C-558	2700 gallons				8760 hr/yr
EQT 0039	C-575 - C-575, SOLVENT 2 RECOVERY DECANTER C-575	70 gallons				8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
				•		
Cathyval P	Plant	·		——————————————————————————————————————	· · - · · · · · · · · · · · · · · · · ·	and the second second
QT 0040	107 - 107, DISTILLATION SCRUBBER C-557					8760 hr/yr
OT 0041	C-535 - C-535, TARS SURGE TANK C-535	2885 gallons				8760 hr/yr
EQT 0042	C-616 - C-616, FLAKER SURGE TANK C-616	3870 gallons				8760 hr/yr
EQT 0043	C-648 - C-648, RECYCLE PRODUCT HOPPER MELTER C-	1060 gallons				8760 hr/yr
	648					
QT 0044	C-655 - C-655, MELTER SURGE TANK C-655	1735 gallons				8760 hr/yr
QT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624					8760 hr/yr
	C-541 - C-541, METHANOL WASHING DRUM C-541 (Vents through C-801)	600 gallons				8760 hr/yr
	C-801 - C-801, SOLVENT 3 RECOVERY FEED TANK C-801	6000 gallons	•			8760 hr/yr
	C-603 - C-603, DISOLVER C-603	2300 gallons				8760 hr/yr
Q1 0049	C-606 - C-606, VACUUM CRYSTALLIZER C-606	3710 gallons				8760 hr/yr
Q1 0050	C-617 - C-617, CENTRIFUGE SURGE TANK C-617	2385 gallons				8760 hr/yr
	109 - 109, BAGHOUSE FILTER/SCRUBBER C-704					8760 hr/yr
	201 - 201, TANK FARM SCRUBBER C-146	-				8760 hr/yr
:	D-111 (Daphne) - D-111 (Daphne), PYROCATECHOL STORAGE TANK	27165 gailons	1.74 MM gallons/yr	1.74 MM gallons/yr	PYROCATECHOL	8760 hr/yr
QT 0054	D-128 - D-128, TARS STORAGE TANK D-128	7050 gallons	1 MM gallons/yr	1 MM gallons/yr	TARS	8760 hr/yr
	D-141 - D-141, VERATROLE STORAGE TANK D-141	5825 gallons	.21 MM gallons/yr	.21 MM gallons/yr	VERATROL	8760 hr/yr
	202 - 202, VENT SCRUBBER C-685					8760 hr/yr
:Q1 0057	C-201 - C-201, PC DISSOLUTION TANK C-201	4750 gallons				8760 hr/yr
	C-553 - C-553, GUAIACOL DISTILLATION FEED TANK C- 553	8000 gallons				8760 hr/yr
	C-561 - C-561, RECYCLE PROCESS WATER TANK C-561	3100 gallons				8760 hr/yr
	C-603 - C-603, GUAIACOL DISTILLATION KETTLE C-603	8800 gallons				8760 hr/yr
	C-615 - C-615, TARS RECEIVER C-615	1150 gallons				8760 hr/yr
	C-645 - C-645, PMDB RECEIVER C-645	2500 gallons				8760 hr/yr
	C-651 - C-651, PC RECEIVER C-651	2100 gallons		7,07-7, 10-10-10-10-10-10-10-10-10-10-10-10-10-1		. 8760 hr/yr
	C-655 - C-655, GUAIACOL LT. ENDS RECEIVER C-655	500 gallons				8760 hr/yr
Q1 0065	C-660 - C-660, INTERS./VERATROLE RECEIVER C-660	1325 gallons				8760 hr/yr
	C-665 - C-665, SECOND RECEIVER C-665	750 gallons				8760 hr/yr
	C-670 - C-670, END OF CAMPAIGN RECEIVER C-670	1300 gallons				8760 hr/yr
	C-675 - C-675, GUAIACOL RECEIVER C-675	5227 gallons				8760 hr/yr
	C-701 - C-701, CRUDE VERATROLE WASH TANK C-701	1550 gallons	****	WALLES AND THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STA		8760 hr/yr
	C-705 - C-705, WATER GUAIACOLATE RECEIVER C-705	1325 gallons				8760 hr/yr
	C-710 - C-710, CAUSTIC WASH RECEIVER C-710	897 gallons				8760 hr/yr
QT 0072	C-751 - C-751, VERATROLE DISTILLATION KETTLE C-751	980 gallons				8760 hr/yr
	C-765 - C-765, LT. ENDS RECEIVER C-765	110 gallons				8760 hr/yr
	C-770 - C-770, DISTILLED VERATROLE RECEIVER C-770	800 gallons				8760 hr/yr
QT 0075	203 - 203, BAGHOUSE FOR HQ HANDLING					8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

Subject Item Inventory:				•	the second second
ID Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant					
EQT 0076 301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)					8760 hr/yr
EQT 0077 C-223 - C-223, PHENOL DRAIN TANK REACTION SURGE DRUM C-223	765 gallons				8760 hr/yr
EQT 0078 C-416 - C-416, PREDEPHENOL REFLUX DRUM C-416	2937 gallons				8760 hr/yr
EQT 0079   C-508 - C-508, VERTICAL TAR DILUTER C-508	264 gallons				8760 hr/yr
EQT 0080   C-530 - C-530, DISTILLATION DRAN TANK C-530	761 gallons				8760 hr/yr
EQT 0081  C-532 - C-532, TAILS SURGE DRUM C-532	4635 gallons				8760 hr/yr
EQT 0082 302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D.   F107)					8760 hr/yr
EQT 0083 C-113 - C-113, PHENOL UNLOADING TANK C-113	1000 gallons				8760 hr/yr
EQT 0084 D-107 - D-107, WASHWATER TANK D-107	88900 gallons				8760 hr/vr
EQT 0085 D-111 - D-111, PHENOL MAKE-UP TANK D-111	66100 gallons				8760 hr/yr
EQT 0086 D-115 - D-115, WASHWATER/GUAIACOL TANK D-115	42300 gallons				8760 hr/yr
EQT 0087 D-315 - D-315, RAFFINATE TANK D-315	58000 gallons	***************************************		<del></del>	8760 hr/yr
EQT 0088 D-204 - D-204, RECYCLE PHENOL TANK D-204	18500 gallons				8760 hr/yr
EQT 0089 303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D.					8760 hr/yr
EQT 0090   C-320 - C-320, IPE STORAGE TANK C-320	23978 gallons				8760 hr/yr
EQT 0091   C-308 - C-308, IPE SETTLER C-308	6780 gallons				8760 hr/vr
EQT 0092   C-311 - C-311, WASHWATER DRUM C-311	6822 gallons				8760 hr/yr
EQT 0093   C-322 - C-322, ETHER DRAIN TANK C-322	673 gallons				8760 hr/yr
EQT 0094   304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)					8760 hr/yr
EQT 0095   C-551 - C-551, PC RECEIVING DRUM C-551	500 gallons	-			8760 hr/yr
EQT 0096 C-563 - C-563, PC FLAKER FEED TANK C-563	500 gallons				8760 hr/yr
EQT 0097   306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)					8760 hr/yr
EQT 0098   C-650 - C-650, REFLUX SURGE DRUM C-650	350 gallons				8760 hr/yr
EQT 0099 D-607 - D-607, HQ DISSOLVER TANK D-607	1375 gallons				8760 hr/yr
EQT 0100 D-610 - D-610, HQ SURGE TANK D-610	7000 gallons				8760 hr/yr
EQT 0101 D-612 - D-612, CARBON TREATER TANK D-612	700 gallons				8760 hr/yr
EQT 0102 D-632 - D-632, CRYSTALLIZATION TANK D-632	1763 gallons				8760 hr/yr
EQT 0103 D-652 - D-652, MOTHER LIQUOR SURGE TANK D-652	8068 gallons			<del></del>	8760 hr/yr
EQT 0104 D-653 - D-653, CONC. COLUMN FEED TANK D-653	6792 gallons				8760 hr/yr
EQT 0105 D-657 - D-657, MOTHER LIQUOR SURGE DRUM D-657	85 gallons			***************************************	8760 hr/yr
EQT 0106 307 - 307, SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601					8760 hr/yr
EQT 0107 308 - 308, OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)					8760 hr/yr
EQT 0109 310 - 310, CARBON BAG DUMP STATION BAGHOUSE S-					8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
athyval F	Plant					
	615 FOR D618 (P&I.D. F601)	1			1	
QT 0110	311 - 311, PC PACKAGING BAGHOUSE Y-731 (P&I.D.					8760 hr/yr
	(F703)		•		!	67 00 1117y1
Q1-0111	312 - 312, HQ PACKAGING BAGHOUSE Y-716 (P&I.D.					8760 hr/yr
OT 0112	F703) 313 - 313, HQ REWORK DUMPER BAGHOUSE S-693 FOR			·		
	D607 (P&I.D. F602)					8760 hr/yr
QT 0113	315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D.		6 MM BTU/hr	6 MM BTU/hr		3024 hr/yr
	F927)		0 171111 5 1 5 1 11	O MIN DIGIN		3024 hryr
QT 0114	315B - 315B, PRIMARY FLUID HEATER F-971 (P&I.D.		8 MM BTU/hr	8 MM BTU/hr		8760 hr/yr
OT 0115	F925)   316 - 316, PRESSURE LEAF FILTER DRYING VENT Y-625					
OT 0116	317 - 317, VACUUM CLEAN-UP PACKAGING BAGHOUSE					8760 hr/yr
CO O O	Y-760X (P&I.D. F703)					8760 hr/yr
QT 0118	401A - 401A, WWT TANK NO. 28 (P&I.D. F101)	600000 gallons		260 gallons/min	WASTEWATER	
QT 0119	401B - 401B, STORMWATER TANK NO. 29 (P&I.D. F101)	1.5 million gallons		290 gallons/min	STORMWATER	8760 hr/yr
QT 0120	401C - 401C, TANK D-197	50000 gallons		48 gallons/min	WASTEWATER	8760 hr/yr
	402A - 402A, WEST AERATION BASIN D210	1.53 million		550 gallons/min	WASTEWATER	8760 hr/yr 8760 hr/yr
		gallons	•	ganons/illi	WASTEWATER	67 00 hr/yr
QT 0122	402B - 402B, EAST AERATION BASIN D213 (P&I.D. F201)	1.53 million		550 gallons/min	WASTEWATER	8760 hr/yr
OT 0122	400C 400C WEST OF A DIFFED DOOF (DOLD FOOD)	gallons				
OT 0123	402C - 402C, WEST CLARIFIER D301 (P&I.D. F302) 402D - 402D, EAST CLARIFIER D304 (P&I.D. F302)	296200 gallons		550 gallons/min	WASTEWATER	8760 hr/yr
OT 0125	M-5 - M-5, CATHY (E925) AND VANESSA (E907) COOLING	296200 gallons		550 gallons/min	WASTEWATER	8760 hr/yr
Q1 0120	TOWERS (P&I.D. F903)		19000 gallons/min	19000 gallons/min		8760 hr/yr
QT 0126	M-6 - M-6, CATHYVAL SUMPS					8760 hr/yr
	C-101 - C-101, IPE SOLVENT STORAGE TANK C-101	8840 gallons				8760 hr/yr
QT 0128	C-351 - C-351, RAG LAYER DIVERTING TANK C-351	3430 gallons			,	8760 hr/yr
QT 0129	C-401 - C-401, AQUEOUS PHASE SURGE TANK C-401	6162 gallons	//			8760 hr/yr
	C-352 - C-352, RAG LAYER SURGE TANK C-352	1500 gallons				8760 hr/yr
QT 0131	C-461 - C-461, AQUEOUS EFFLUENT TANK C-461	715 gallons				8760 hr/yr
QT 0132	C-521 - C-521, ORGANIC PHASE SURGE TANK C-521	7070 gallons				8760 hr/yr
	C-132 - C-132, MeCI STORAGE TANK C-132	14340 gallons				8760 hr/yr
	C-136 - C-136, EtCl STORAGE TANK C-136	15400 gallons				8760 hr/yr
QT 0135	C-301 - C-301, ACIDIFICATION/DECANTATION TANK C-	8000 gallons				8760 hr/yr
OT 0400	301					
OT 0127	C-503 - C-503, DEETHERATION IPE DECANTER C-503	208 gallons				8760 hr/yr
	D-681 - D-681, SCREENER RESIDUE DISSOLVER D-681 110 - 110, HIGH PURITY PC MIXING VESSEL	212 gallons				8760 hr/yr
	C-202 - Premixing Reactor	6000 gallons	2200000 lb/yr	2200000 lb/yr		8760 hr/yr
OT 0180	C-207 - Veratrole Stripper					8760 hr/yr
GI 0109	10-201 - vetatiole Stribbet					8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

מו	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
athyval	Plant					
	C-217 - No. 1 Condensation Reactor					
	C-219 - No. 2 Condensation Reactor	1500				8760 hr/yr
	2 C-221 - No. 3 Condensation Reactor	1500 gallons				8760 hr/yr
	3 C-223 - No. 4 Condensation Reactor	1500 gallons				8760 hr/yr
	G-225 - No. 5 Condensation Reactor	1500 gallons			***************************************	8760 hr/yr
	C-227 - Polishing Reactor	1500 gallons				8760 hr/yr
	C-241 - Guaiacol Extraction Column	<u> </u>				8760 hr/yr
	C-241 - Guaractic Extraction Column				Make a de december 1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (	8760 hr/yr
	C-301 - Guaiacol Recovery Column					8760 hr/yr
	C-301 - Gualacol Recovery Column C-306 - Gualacol/Tars Separator					8760 hr/yr
	C-312 - Solvent 1Stripper Decanter					8760 hr/yr
OT 0200	C-314 - Solvent 1Stripper Decanter			<u> </u>		8760 hr/yr
OT 0201	2   C-316 - Solvent 1 Cold Trap					8760 hr/yr
	C-320 - Gualacol Distillation Reflux Drum					8760 hr/yr
						8760 hr/yr
QT 0205	C-322X - Solvent 1 Vacuum Package Separator					8760 hr/yr
						8760 hr/yr
	C-407 - Oxidation Reactor					8760 hr/yr
QT 0207						8760 hr/yr
Q1 0208	C-429 - CO2 Separator				***************************************	8760 hr/yr
	C-435 - Vanillin Extraction Column					8760 hr/yr
QT 0210	C-441 - Solvent 2 Washing Column					8760 hr/yr
QT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column				* 18 - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel - Annah Samuel -	8760 hr/yr
QT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column				· · · · · · · · · · · · · · · · · · ·	8760 hr/yr
	C-516 - Solvent 2 Cold Trap					8760 hr/yr
QT 0214	C-533X - Solvent 2 Vacuum Package Separator				***************************************	8760 hr/yr
	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)					8760 hr/yr
	C-568 - Solvent 2 Recovery Column (Top Rectification)					8760 hr/yr
	E-428 - Condenser					8760 hr/yr
QT 0218	H-520 - Vacuum System					8760 hr/yr
	C-525 - Tars Removal Column					8760 hr/yr
	C-525 - Tars By-Pass Tank					8760 hr/yr
QT 0221						8760 hr/yr
	C-555A/B - Vanillin Cold Traps					8760 hr/yr
QT 0223	C-562X - Vanillin Purification Vacuum Package Separator				***************************************	8760 hr/yr
QT 0224	H-556 - Vacuum System			<del>                                     </del>		8760 hr/yr
QT 0225	C-634X - Dryer Scrubber					8760 hr/vr
QT 0226	C-637X - Crystallization Vacuum Package Separator			<u> </u>		8760 hr/yr
OT 0227	C-640 - Dryer			<del></del>	· · · · · · · · · · · · · · · · · · ·	8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval F	lant			The will be the best and the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the s		
EQT 0228	C-805 - Solvent 3 Recovery Column					8760 hr/yr
EQT 0229	H-619 - Vacuum System					8760 hr/yr
EQT 0230	Y-620 - Centrifuge A			<del>                                     </del>		8760 hr/yr
	Y-621 - Centrifuge B					8760 hr/yr
EQT 0232	Y-640 - Dryer			-		8760 hr/yr
	C-606 - Guaiacol Distillation Column					
	C-683X - Guaiacol Vacuum Package Separator					8760 hr/yr
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps					8760 hr/yr
	C-754 - Veratrole Distillation Column	450 gallons				8760 hr/yr
	C-783X - Veratrole Vacuum Separator	100 ganono				8760 hr/yr
	C-787 - Veratrole Distillation Cold Traps				···	8760 hr/yr
FOT 0239	C-213 - First Reactor					8760 hr/yr
	C-215 - Second Reactor					8760 hr/yr
	C-217 - Third Reactor		-			8760 hr/yr
	C-219 - Fourth Reactor					8760 hr/yr
	C-231 - Fifth Reactor	<del></del>	<del></del>			8760 hr/yr
	C-501 - Detarring Column		<u> </u>	ļ		8760 hr/yr
	C-521 - Final Dephenoling Column	-		<u> </u>		8760 hr/yr
	E-418 - Phenol Condenser		1	<u></u>		8760 hr/yr
	H-524 - Vacuum System	· · · · · · · · · · · · · · · · · · ·		<del></del>		8760 hr/yr
FOT 0248	C-301 - Water Stripper		1			8760 hr/yr
FOT 0249	C-313 - Extraction Column					8760 hr/yr
	C-405 - Dehydration Column					8760 hr/yr
	E-401 - Solvent Vent Condenser					8760 hr/yr
	C-536 - Splitter Column (PC/HQ Separation)					8760 hr/yr
	H-545 - Vacuum System					8760 hr/yr
EOT 0255	S-560 - PC Flaker					8760 hr/yr
	C-251 - Batch Reactor					8760 hr/yr
						8760 hr/yr
EQT 0250	H-640 - Vacuum System for Crystallizers	<u></u>				8760 hr/yr
	C-451 - Extraction Column					8760 hr/yr
	C-501 - Detheration Column					8760 hr/yr
	C-511 - Detheration Gualacol Decanter					8760 hr/yr
EQT 0260	C-551 - Crude Gualacol Dehydration Column					8760 hr/yr
	C-555 - Wet Gualacol Tank					8760 hr/yr
	M-8A - Fire-Water Pump G972A		370 horsepower	370 horsepower		100 hr/yr
	M-8B - Fire-Water Pump G972B		370 horsepower	370 horsepower		100 hr/yr
	M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump		500 horsepower	222 horsepower		400 hr/yr
EQT 0289	E-318 - Predephenoling Vent Condenser					8760 hr/yr

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ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval Plant						
	Detarring Condenser					8760 hr/vr
	-6V, VANESSA FUGITIVE EMISSIONS					8760 hr/yr
	-6C, CATHY FUGITIVE EMISSIONS					8760 hr/yr
FUG 0005 F-6D - F	-6D, DAPHNE FUGITIVE EMISSIONS					8760 hr/yr

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
athyval	Plant	<del></del>					
QT 0009	9 101 - 101, LIGHTS TANK FARM SCRUBBER C-165	7.5	22.1	.25	W 1 1 7 74 8 8 Ad Indian	70	
QT 0015	5 102 - 102, HEAVIES TANK FARM SCRUBBER C-187	- 7.5	159	.67		8	86
EQT 0019	9 103 - 103, CONDENSATION SCRUBBER C-201	5.4	15.9	.25		88	86
EQT 0021	1 104 - 104, SOLVENT 1 VENT SCRUBBER C-248	5.5	16.2	.25	dak	70	86
EQT 0028	3 105 - 105, OXIDATION SCRUBBER C-419	29.8	970	.83		70	86
QT 0031	1 106 - 106, VANILLIN EXTRACTION SCRUBBER C-427	30,4	90	.25	TINGE 1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	70	86
QT 0040	0 107 - 107, DISTILLATION SCRUBBER C-557	1.6	8.2	.33		70	86
QT 0045	5 108 - 108, CRYSTALLIZATION SCRUBBER C-624	5.6	16.5	.25		88	86
QT 0051	1 109 - 109, BAGHOUSE FILTER/SCRUBBER C-704	75	7952	1.5		88	75
QT 0052	2 201 - 201, TANK FARM SCRUBBER C-146	5.4	15.9	.25		30	75
QT 0056	3 202 - 202, VENT SCRUBBER C-685	75.4	387	33		85	75
EQT 0075	5 203 - 203, BAGHOUSE FOR HQ HANDLING	37	435.9	.5		60	
EQT 0076	3 301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)	9.45	28	.25		35	75
QT 0082	2 302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)	20.7	61	.25		32	75
EQT 0089	9 303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)	7.5	22.1	.25		35	75
EQT 0094	4 304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)	2.7	7.95	.25		35	75
QT 0097	7 306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)	1.97	10.1	.33		70	75
EQT 0106	3 307 - 307, SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601	34	400	.5		23	
	7 308 - 308, OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)	34	400	.5		23	
	9 310 - 310, CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)	. 34	400	.5		23	
EQT 0110	0 311 - 311, PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)	42.5	500	.5		59	75
QT 011	1 312 - 312, HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)	42.5	500	.5		59	75
EQT 0112	2 313 - 313, HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D.	34	400	.5		59	75

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#### Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Cathyval F	Plant						
	F602)						
EQT 0113	315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)	44.2	2085	1		40	700
EQT 0114	315B - 315B, PRIMARY FLUID HEATER F-971 (P&I.D. F925)	28.6	3760	1.67		15.8	735
	316 - 316, PRESSURE LEAF FILTER DRYING VENT Y-625	283	1452	.33		70	
	317 - 317, VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I,D. F703)	7.64	360	1		60	75
	401A - 401A, WWT TANK NO. 28 (P&I.D. F101)			1.1.		45.5	
	401B - 401B, STORMWATER TANK NO. 29 (P&I.D. F101)					43.5	
EQT 0121	402A - 402A, WEST AERATION BASIN D210					20	** *
EQT 0122	402B - 402B, EAST AERATION BASIN D213 (P&I.D. F201)				***************************************	20	
EQT 0123	402C - 402C, WEST CLARIFIER D301 (P&I.D. F302)				telescone meneral establishment of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the secon	14	
EQT 0124	402D - 402D, EAST CLARIFIER D304 (P&I.D. F302)					14	
EQT 0125	M-5 - M-5, CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)		1986 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 dd 2011 c - 1886 d				
EQT 0126	M-6 - M-6, CATHYVAL SUMPS						
EQT 0139	110 - 110, HIGH PURITY PC MIXING VESSEL	61	20	.08		32	120
FUG 0001	F-6V - F-6V, VANESSA FUGITIVE EMISSIONS						
FUG 0004	F-6C - F-6C, CATHY FUGITIVE EMISSIONS						
FUG 0005	F-6D - F-6D, DAPHNE FUGITIVE EMISSIONS						
GRP 0014	WWT - EMISSIONS CAP - WW TREATMENT PLANT						

#### Relationships:

םו	Description	Relationship	D	Description
EQT 0010	D-148 - D-148, VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D- 148	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
QT 0011	D-149 - D-149, ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
QT 0012	D-152 - D-152, SOLVENT 2 TANK (MIBK STORAGE) D-152	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
EQT 0013	D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
EQT 0014	D-169 - D-169, SOLVENT 3 TANK (METHANOL STORAGE) D-169	Controlled by	EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165
EQT 0016	D-107 (Vanessa) - D-107 (Vanessa), GUAIACOL STORAGE TANK D-107	Controlled by	EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187
EQT 0017	D-111 (Vanessa) - D-111 (Vanessa), GUETOL STORAGE TANK D-	Controlled by	EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187
EQT 0018	D-113 (Vanessa) - D-113 (Vanessa), GLYOXYLIC ACID STORAGE TANK D-113	Controlled by	EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187
EQT 0020	C-216 - C-216, GUAIACOL RECYCLE TANK C-216	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201

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#### Relationships:

Relationships:				
ID	Description	Relationship	ID	Description
EQT 0022	C-236 - C-236, NEUTRALIZATION SURGE TANK C-236	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0023	C-240 - C-240, EXTRACTOR TAILS UPSET TANK C-240	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0024	C-243 - C-243, EXTRACTOR 1 TAILS SAFETY DECANTER C-243	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0025	C-244 - C-244, MANDELATE SURGE TANK C-244	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0026	C-249 - C-249, SOLVENT 1 SURGE TANK C-249	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0027	C-247 - C-247, SOLVENT 1 WASHING SAFETY DECANTER C-247	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0029	C-409 - C-409, MANDELATE SURGE TANK C-409	Controlled by	EQT 0028	105 - 105, OXIDATION SCRUBBER C-419
EQT 0030	C-417 - D-417, OXIDATION SURGE TANK D-417	Controlled by	EQT 0028	105 - 105, OXIDATION SCRUBBER C-419
EQT 0032	C-421 - C-421, SOLVENT 2 SURGE TANK C-421	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0033	C-430 - C-430, SOLVENT 2 DECANTER C-430	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0034	C-432 - C-432, EXTRACTION 2 DRAIN TANK C-432	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0035	C-434 - C-434, EXTRACTION 2 TAILS SAFETY DECANTER C-434	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0036	C-441 - C-441, AQUEOUS PHASE SURGE TANK C-441	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0037	C-501 - C-501, SOLVENT 2 DISTILLATION SURGE TANK C-501	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0038	C-558 - C-558, AQUEOUS EFFLUENTS TANK C-558	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0039	C-575 - C-575, SOLVENT 2 RECOVERY DECANTER C-575	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0041	C-535 - C-535, TARS SURGE TANK C-535	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0042	C-616 - C-616, FLAKER SURGE TANK C-616	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0043	C-648 - C-648, RECYCLE PRODUCT HOPPER MELTER C-648	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0044	C-655 - C-655, MELTER SURGE TANK C-655	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0046	C-541 - C-541, METHANOL WASHING DRUM C-541 (Vents through	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0047	' C-801) C-801 - C-801, SOLVENT 3 RECOVERY FEED TANK C-801	Controlled by		400 400 OD 407AL4 17ATIOL 600 100 100 100
EQT 0047	C-603 - C-603, DISOLVER C-603	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0048	C-606 - C-606, VACUUM CRYSTALLIZER C-606	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0050		Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0053	C-617 - C-617, CENTRIFUGE SURGE TANK C-617	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQ1 0053	D-111 (Daphne) - D-111 (Daphne), PYROCATECHOL STORAGE	Controlled by	EQT 0052	201 - 201, TANK FARM SCRUBBER C-146
EQT 0054	D-128 - D-128, TARS STORAGE TANK D-128	Controlled by	EQT 0052	201 - 201, TANK FARM SCRUBBER C-146
EQT 0055	D-141 - D-141, VERATROLE STORAGE TANK D-141	Controlled by	EQT 0052	201 - 201, TANK FARM SCRUBBER C-146
EQT 0057	C-201 - C-201, PC DISSOLUTION TANK C-201	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0058	C-553 - C-553, GUAIACOL DISTILLATION FEED TANK C-553	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0059	C-561 - C-561, RECYCLE PROCESS WATER TANK C-561	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0060	C-603 - C-603, GUAIACOL DISTILLATION KETTLE C-603	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0061	C-615 - C-615, TARS RECEIVER C-615	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0062	C-645 - C-645, PMDB RECEIVER C-645	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0063	C-651 - C-651, PC RECEIVER C-651	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685

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Relationships	<b>:</b>			·
. ID	Description	Relationship	ID	Description
EQT 0064	C-655 - C-655, GUAIACOL LT. ENDS RECEIVER C-655	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0065	C-660 - C-660, INTERS,/VERATROLE RECEIVER C-660	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0066	C-665 - C-665, SECOND RECEIVER C-665	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0067	C-670 - C-670, END OF CAMPAIGN RECEIVER C-670	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0068	C-675 - C-675, GUAIACOL RECEIVER C-675	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0069	C-701 - C-701, CRUDE VERATROLE WASH TANK C-701	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0070	C-705 - C-705, WATER GUAIACOLATE RECEIVER C-705	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0071	C-710 - C-710, CAUSTIC WASH RECEIVER C-710	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0072	C-751 - C-751, VERATROLE DISTILLATION KETTLE C-751	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0073	C-765 - C-765, LT. ENDS RECEIVER C-765	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0074	C-770 - C-770, DISTILLED VERATROLE RECEIVER C-770	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0077	C-223 - C-223, PHENOL DRAIN TANK REACTION SURGE DRUM C-223	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0078	C-416 - C-416, PREDEPHENOL REFLUX DRUM C-416	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0079	C-508 - C-508, VERTICAL TAR DILUTER C-508	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0080	C-530 - C-530, DISTILLATION DRAN TANK C-530	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0081	C-532 - C-532, TAILS SURGE DRUM C-532	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0083	C-113 - C-113, PHENOL UNLOADING TANK C-113	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0084	D-107 - D-107, WASHWATER TANK D-107	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0085	D-111 - D-111, PHENOL MAKE-UP TANK D-111	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0086	D-115 - D-115, WASHWATER/GUAIACOL TANK D-115	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0087	D-315 - D-315, RAFFINATE TANK D-315	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0088	D-204 - D-204, RECYCLE PHENOL TANK D-204	Controlled by	EQT 0082	302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0090	C-320 - C-320, IPE STORAGE TANK C-320	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0091	C-308 - C-308, IPE SETTLER C-308	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0092	C-311 - C-311, WASHWATER DRUM C-311	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0093	C-322 - C-322, ETHER DRAIN TANK C-322	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0095	C-551 - C-551, PC RECEIVING DRUM C-551	Controlled by	EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0096	C-563 - C-563, PC FLAKER FEED TANK C-563	Controlled by	EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0098	C-650 - C-650, REFLUX SURGE DRUM C-650	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&i.D.
EQT 0099	D-607 - D-607, HQ DISSOLVER TANK D-607	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)

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#### Relationships:

ID	Description	Relationship	ID	Description
EQT 0100	D-610 - D-610, HQ SURGE TANK D-610	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D.
EQT 0101	D-612 - D-612, CARBON TREATER TANK D-612	Controlled by	EQT 0097	F607)
<del>-</del>	D 012 - D-012, OAKBON TREATER TANK D-012	Controlled by	EQ1 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0102	D-632 - D-632, CRYSTALLIZATION TANK D-632	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D.
EQT 0103	D-652 - D-652, MOTHER LIQUOR SURGE TANK D-652	Controlled by	EQT 0097	F607)
	<u></u>	Controlled by	EQ1 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0104	D-653 - D-653, CONC. COLUMN FEED TANK D-653	Controlled by	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D.
EQT 0105	D-657 - D-657, MOTHER LIQUOR SURGE DRUM D-657	Controlled by	EQT 0097	F607)
ļ	- D 607 - D-607, MOTHER EIGOOR SURGE BROWN 5-637	Controlled by	EQ1 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0188	C-202 - Premixing Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0189	C-207 - Veratrole Stripper	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0190	C-217 - No. 1 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0191	C-219 - No. 2 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0192	C-221 - No. 3 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0193	C-223 - No. 4 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0194	C-225 - No. 5 Condensation Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0195	C-227 - Polishing Reactor	Controlled by	EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201
EQT 0196	C-241 - Gualacol Extraction Column	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0197	C-245 - Solvent 1 Washing Column	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0198	C-301 - Guaiacol Recovery Column	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0199	C-306 - Guaiacol/Tars Separator	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0200	C-312 - Solvent 1Stripper Decanter	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0201	C-314 - Solvent 1Stripper	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0202	C-316 - Solvent 1 Cold Trap	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0205	H-317 - Vacuum System	Controlled by	EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248
EQT 0206	C-407 - Oxidation Reactor	Controlled by	EQT 0028	105 - 105, OXIDATION SCRUBBER C-419
EQT 0207	C-416 - Oxidation Column	Controlled by	EQT 0028	105 - 105, OXIDATION SCRUBBER C-419
EQT 0208	C-429 - CO2 Separator	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0209	C-435 - Vanillin Extraction Column	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0210	C-441 - Solvent 2 Washing Column	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0213	C-516 - Solvent 2 Cold Trap	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427

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#### Relationships:

ID	Description	Relationship	ID	Description
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0217	E-428 - Condenser	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0218	H-520 - Vacuum System	Controlled by	EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427
EQT 0219	C-525 - Tars Removal Column	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0220	C-525 - Tars By-Pass Tank	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0221	C-545 - Lights Removal Column	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0222	C-555A/B - Vanillin Cold Traps	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0224	H-556 - Vacuum System	Controlled by	EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557
EQT 0225	C-634X - Dryer Scrubber	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0226	C-637X - Crystallization Vacuum Package Separator	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0227	C-640 - Dryer	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0228	C-805 - Solvent 3 Recovery Column	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0229	H-619 - Vacuum System	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0230	Y-620 - Centrifuge A	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0231	Y-621 - Centrifuge B	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0232	Y-640 - Dryer	Controlled by	EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624
EQT 0233	C-606 - Gualacol Distillation Column	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0234	C-683X - Guaiacol Vacuum Package Separator	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0236	C-754 - Veratrole Distillation Column	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0237	C-783X - Veratrole Vacuum Separator	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0238	C-787 - Veratrole Distillation Cold Traps	Controlled by	EQT 0056	202 - 202, VENT SCRUBBER C-685
EQT 0239	C-213 - First Reactor	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0240	C-215 - Second Reactor	Vents to	EQT 0239	C-213 - First Reactor
EQT 0241	C-217 - Third Reactor	· Vents to	EQT 0243	C-231 - Fifth Reactor
EQT 0242	C-219 - Fourth Reactor	Vents to	EQT 0241	C-217 - Third Reactor
EQT 0243	C-231 - Fifth Reactor	Vents to	EQT 0240	C-215 - Second Reactor
EQT 0244	C-501 - Detarring Column	Vents to	EQT 0247	H-524 - Vacuum System
EQT 0245	C-521 - Final Dephenoling Column	Vents to	EQT 0247	H-524 - Vacuum System
EQT 0246	E-418 - Phenol Condenser	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0247	H-524 - Vacuum System	Controlled by	EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0248	C-301 - Water Stripper	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I,D. F402)

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#### Relationships:

10	Description	Relationship	ID	Description
EQT 0249	C-313 - Extraction Column	Controlled by	EQT 0089	303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D.
EQT 0250	C-405 - Dehydration Column	Controlled by	EQT 0089	F402) 303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D.
EQT 0251	E-401 - Solvent Vent Condenser	Controlled by	EQT 0089	(F402)
EQT 0252	C-536 - Splitter Column (PC/HQ Separation)			303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
QT 0253	H-545 - Vacuum System	Controlled by Controlled by	EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
QT 0254	S-560 - PC Flaker	Controlled by	EQT 0094	304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508) 304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0256	H-640 - Vacuum System for Crystallizers	Vents to	EQT 0097	306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D.
L		<u> </u>		F607)

#### Subject Item Groups:

ID	Group Type	Group Description
1	Equipment Group	- Cathy
1 :	Equipment Group	- Daphne
GRP 0013	Equipment Group	- Vanessa
GRP 0014	Equipment Group	WWT - EMISSIONS CAP - WW TREATMENT PLANT
GRP 0022	Equipment Group	Fire Pump Diesel Engines - Fire Pump Diesel Engines
UNF 0001	Unit or Facility Wide	- Cathyval Plant

ID	Description	Member of Groups
EQT 0009	101 - 101, LIGHTS TANK FARM SCRUBBER C-165	GRP0000000013
EQT 0010	D-148 - D-148, VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	GRP000000013
EQT 0011	D-149 - D-149, ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	GRP000000013
EQT 0012	D-152 - D-152, SOLVENT 2 TANK (MIBK STORAGE) D-152	GRP000000013
EQT 0013	D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153	GRP000000013
EQT 0014	D-169 - D-169, SOLVENT 3 TANK (METHANOL STORAGE) D-169	GRP000000013
EQT 0015	102 - 102, HEAVIES TANK FARM SCRUBBER C-187	GRP000000013
EQT 0016	D-107 (Vanessa) - D-107 (Vanessa), GUAIACOL STORAGE TANK D-107	GRP000000013
EQT 0017	D-111 (Vanessa) - D-111 (Vanessa), GUETOL STORAGE TANK D-111	GRP000000013
EQT 0018	D-113 (Vanessa) - D-113 (Vanessa), GLYOXYLIC ACID STORAGE TANK D-113	GRP000000013
EQT 0019	103 - 103, CONDENSATION SCRUBBER C-201	GRP000000013
EQT 0020	C-216 - C-216, GUAIACOL RECYCLE TANK C-216	
EQT 0021	104 - 104, SOLVENT 1 VENT SCRUBBER C-248	GRP000000013
EQT 0022	C-236 - C-236, NEUTRALIZATION SURGE TANK C-236	GRP000000013
EQT 0023	C-240 - C-240, EXTRACTOR TAILS UPSET TANK C-240	GRP000000013
EQT 0024	C-243 - C-243, EXTRACTOR 1 TAILS SAFETY DECANTER C-243	GRP000000013
EQT 0025	C.244 C.244 MANDELATE CURDE TANK C.243	GRP000000013
	C-244 - C-244, MANDELATE SURGE TANK C-244	GRP000000013

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ID	Description	Member of Groups
EQT 0026	C-249 - C-249, SOLVENT 1 SURGE TANK C-249	GRP000000013
EQT 0027	C-247 - C-247, SOLVENT 1 WASHING SAFETY DECANTER C-247	GRP000000013
EQT 0028	105 - 105, OXIDATION SCRUBBER C-419	GRP000000013
EQT 0029	C-409 - C-409, MANDELATE SURGE TANK C-409	GRP000000013
EQT 0030	C-417 - D-417, OXIDATION SURGE TANK D-417	GRP000000013
EQT 0031	106 - 106, VANILLIN EXTRACTION SCRUBBER C-427	GRP000000013
EQT 0032	C-421 - C-421, SOLVENT 2 SURGE TANK C-421	GRP000000013
EQT 0033	C-430 - C-430, SOLVENT 2 DECANTER C-430	GRP0000000013
EQT 0034	C-432 - C-432, EXTRACTION 2 DRAIN TANK C-432	GRP000000013
EQT 0035	C-434 - C-434, EXTRACTION 2 TAILS SAFETY DECANTER C-434	GRP000000013
EQT 0036	C-441 - C-441, AQUEOUS PHASE SURGE TANK C-441	GRP000000013
EQT 0037	C-501 - C-501, SOLVENT 2 DISTILLATION SURGE TANK C-501	GRP000000013
EQT 0038	C-558 - C-558, AQUEOUS EFFLUENTS TANK C-558	GRP000000013
EQT 0039	C-575 - C-575, SOLVENT 2 RECOVERY DECANTER C-575	GRP000000013
EQT 0040	107 - 107, DISTILLATION SCRUBBER C-557	GRP000000013
EQT 0041	C-535 - C-535, TARS SURGE TANK C-535	GRP000000013
EQT 0042	C-616 - C-616, FLAKER SURGE TANK C-616	GRP000000013
EQT 0043	C-648 - C-648, RECYCLE PRODUCT HOPPER MELTER C-648	GRP000000013
EQT 0044	C-655 - C-655, MELTER SURGE TANK C-655	GRP000000013
EQT 0045	108 - 108, CRYSTALLIZATION SCRUBBER C-624	GRP000000013
EQT 0046	C-541 - C-541, METHANOL WASHING DRUM C-541 (Vents through C-801)	GRP000000013
EQT 0047	C-801 - C-801, SOLVENT 3 RECOVERY FEED TANK C-801	GRP000000013
EQT 0048	C-603 - C-603, DISOLVER C-603	GRP000000013
EQT 0049	C-606 - C-606, VACUUM CRYSTALLIZER C-606	GRP000000013
EQT 0050	C-617 - C-617, CENTRIFUGE SURGE TANK C-617	GRP000000013
EQT 0051	109 - 109, BAGHOUSE FILTER/SCRUBBER C-704	GRP000000013
EQT 0052	201 - 201, TANK FARM SCRUBBER C-146	GRP000000012
EQT 0053	D-111 (Daphne) - D-111 (Daphne), PYROCATECHOL STORAGE TANK	GRP000000012
EQT 0055	D-141 - D-141, VERATROLE STORAGE TANK D-141	GRP000000012
EQT 0057	C-201 - C-201, PC DISSOLUTION TANK C-201	GRP000000012
EQT 0058	C-553 - C-553, GUAIACOL DISTILLATION FEED TANK C-553	GRP000000012
EQT 0059	C-561 - C-561, RECYCLE PROCESS WATER TANK C-561	GRP000000012
EQT 0060	C-603 - C-603, GUAIACOL DISTILLATION KETTLE C-603	GRP000000012
EQT 0061	C-615 - C-615, TARS RECEIVER C-615	GRP000000012
EQT 0062	C-645 - C-645, PMDB RECEIVER C-645	GRP000000012
EQT 0063	C-651 - C-651, PC RECEIVER C-651	GRP000000012
EQT 0064	C-655 - C-655, GUAIACOL LT. ENDS RECEIVER C-655	GRP000000012
EQT 0065	C-660 - C-660, INTERS./VERATROLE RECEIVER C-660	GRP0000000012
EQT 0066	C-665 - C-665, SECOND RECEIVER C-665	GRP000000012
EQT 0067	C-670 - C-670, END OF CAMPAIGN RECEIVER C-670	GRP000000012
EQT 0068	C-675 - C-675, GUAIACOL RECEIVER C-675	GRP000000012

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ID	Description	Member of Groups
EQT 0069	C-701 - C-701, CRUDE VERATROLE WASH TANK C-701	GRP000000012
EQT 0070	C-705 - C-705, WATER GUAIACOLATE RECEIVER C-705	GRP000000012
EQT 0071	C-710 - C-710, CAUSTIC WASH RECEIVER C-710	GRP000000012
EQT 0072	C-751 - C-751, VERATROLE DISTILLATION KETTLE C-751	GRP000000012
EQT 0073	C-765 - C-765, LT. ENDS RECEIVER C-765	GRP000000012
EQT 0074	C-770 - C-770, DISTILLED VERATROLE RECEIVER C-770	GRP000000012
EQT 0076	301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)	GRP0000000006
EQT 0077	C-223 - C-223, PHENOL DRAIN TANK REACTION SURGE DRUM C-223	GRP000000006
EQT 0078	C-416 - C-416, PREDEPHENOL REFLUX DRUM C-416	GRP000000006
EQT 0079	C-508 - C-508, VERTICAL TAR DILUTER C-508	GRP000000006
EQT 0080	C-530 - C-530, DISTILLATION DRAN TANK C-530	GRP000000006
EQT 0081	C-532 - C-532, TAILS SURGE DRUM C-532	GRP000000006
EQT 0083	C-113 - C-113, PHENOL UNLOADING TANK C-113	GRP000000006
EQT 0084	D-107 - D-107, WASHWATER TANK D-107	GRP000000006
EQT 0085	D-111 - D-111, PHENOL MAKE-UP TANK D-111	GRP0000000006
EQT 0086	D-115 - D-115, WASHWATER/GUAIACOL TANK D-115	GRP0000000006
EQT 0087	D-315 - D-315, RAFFINATE TANK D-315	GRP000000006
EQT 0088	D-204 - D-204, RECYCLE PHENOL TANK D-204	GRP0000000006
EQT 0090	C-320 - C-320, IPE STORAGE TANK C-320	GRP000000006
EQT 0091	C-308 - C-308, IPE SETTLER C-308	GRP000000006
EQT 0092	C-311 - C-311, WASHWATER DRUM C-311	GRP000000006
EQT 0093	C-322 - C-322, ETHER DRAIN TANK C-322	GRP000000006
EQT 0095	C-551 - C-551, PC RECEIVING DRUM C-551	GRP000000006
EQT 0096	C-563 - C-563, PC FLAKER FEED TANK C-563	GRP000000006
EQT 0098	C-650 - C-650, REFLUX SURGE DRUM C-650	GRP000000006
EQT 0099	D-607 - D-607, HQ DISSOLVER TANK D-607	GRP000000006
EQT 0100	D-610 - D-610, HQ SURGE TANK D-610	GRP000000006
EQT 0101	D-612 - D-612, CARBON TREATER TANK D-612	GRP000000006
EQT 0102	D-632 - D-632, CRYSTALLIZATION TANK D-632	GRP000000006
EQT 0103	D-652 - D-652, MOTHER LIQUOR SURGE TANK D-652	GRP000000006
EQT 0104	D-653 - D-653, CONC. COLUMN FEED TANK D-653	GRP000000006
EQT 0105	D-657 - D-657, MOTHER LIQUOR SURGE DRUM D-657	GRP000000006
EQT 0106	307 - 307, SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601	GRP000000006
EQT 0107	308 - 308, OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)	GRP000000006
EQT 0109	310 - 310, CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)	GRP000000006
EQT 0110	311 - 311, PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)	GRP000000006
EQT 0111	312 - 312, HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)	GRP000000006
EQT 0112	313 - 313, HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)	GRP000000006
EQT 0113	315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)	GRP000000006
EQT 0114	315B - 315B, PRIMARY FLUID HEATER F-971 (P&I.D. F925)	GRP000000006
EQT 0115	316 - 316, PRESSURE LEAF FILTER DRYING VENT Y-625	GRP000000006

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ID	Description	Member of Groups
EQT 0116	317 - 317, VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)	GRP000000006
EQT 0118	401A - 401A, WWT TANK NO. 28 (P&I.D. F101)	GRP000000014
EQT 0119	401B - 401B, STORMWATER TANK NO. 29 (P&I.D. F101)	GRP000000014
EQT 0120	401C - 401C, TANK D-197	GRP000000014
EQT 0121	402A - 402A, WEST AERATION BASIN D210	GRP000000014
EQT 0122	402B - 402B, EAST AERATION BASIN D213 (P&I.D. F201)	GRP000000014
EQT 0123	402C - 402C, WEST CLARIFIER D301 (P&I.D. F302)	GRP000000014
EQT 0.124	402D - 402D, EAST CLARIFIER D304 (P&I.D. F302)	GRP000000014
EQT 0127	C-101 - C-101, IPE SOLVENT STORAGE TANK C-101	GRP000000012
EQT 0128	C-351 - C-351, RAG LAYER DIVERTING TANK C-351	GRP000000012
EQT 0129	C-401 - C-401, AQUEOUS PHASE SURGE TANK C-401	GRP000000012
EQT 0130	C-352 - C-352, RAG LAYER SURGE TANK C-352	GRP000000012
EQT 0131	C-461 - C-461, AQUEOUS EFFLUENT TANK C-461	GRP000000012
EQT 0132	C-521 - C-521, ORGANIC PHASE SURGE TANK C-521	GRP000000012
EQT 0133	C-132 - C-132, MeCI STORAGE TANK C-132	GRP000000012
EQT 0134	C-136 - C-136, EtCl STORAGE TANK C-136	GRP0000000012
EQT 0135	C-301 - C-301, ACIDIFICATION/DECANTATION TANK C-301	· GRP000000012
EQT 0136	C-503 - C-503, DEETHERATION IPE DECANTER C-503	GRP000000012
EQT 0137	D-681 - D-681, SCREENER RESIDUE DISSOLVER D-681	GRP000000006
EQT 0139	110 - 110, HIGH PURITY PC MIXING VESSEL	GRP000000006
EQT 0188	C-202 - Premixing Reactor	GRP000000013
EQT 0189	C-207 - Veratrole Stripper	GRP000000013
EQT 0190	C-217 - No. 1 Condensation Reactor	GRP000000013
EQT 0191	C-219 - No. 2 Condensation Reactor	GRP000000013
EQT 0192	C-221 - No. 3 Condensation Reactor	GRP000000013
EQT 0193	C-223 - No. 4 Condensation Reactor	GRP000000013
EQT 0194	C-225 - No. 5 Condensation Reactor	GRP000000013
EQT 0195	C-227 - Polishing Reactor	GRP000000013
EQT 0196	C-241 - Guaiacol Extraction Column	GRP000000013
EQT 0197	C-245 - Solvent 1 Washing Column	GRP000000013
EQT 0198	C-301 - Gualacol Recovery Column	GRP000000013
EQT 0199	C-306 - Guaiacol/Tars Separator	GRP000000013
EQT 0200	C-312 - Solvent 1Stripper Decanter	GRP000000013
EQT 0201	C-314 - Solvent 1Stripper	GRP000000013
EQT 0202	C-316 - Solvent 1 Cold Trap	GRP000000013
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum	GRP000000013
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator	GRP000000013
EQT 0205	H-317 - Vacuum System	GRP000000013
EQT 0206	C-407 - Oxidation Reactor	GRP000000013
EQT 0207	C-416 - Oxidation Column	GRP000000013
EQT 0208	C-429 - CO2 Separator	GRP000000013

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(D	Description	Member of Groups
EQT 0209	C-435 - Vanillin Extraction Column	GRP000000013
EQT 0210	C-441 - Solvent 2 Washing Column	GRP000000013
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column	GRP000000013
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column	GRP000000013
EQT 0213	C-516 - Solvent 2 Cold Trap	GRP000000013
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator	GRP000000013
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)	GRP000000013
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)	GRP000000013
EQT 0217	E-428 - Condenser	GRP000000013
EQT 0218	H-520 - Vacuum System	GRP000000013
EQT 0219	C-525 - Tars Removal Column	GRP000000013
EQT 0220	C-525 - Tars By-Pass Tank	GRP000000013
EQT 0221	C-545 - Lights Removal Column	GRP000000013
EQT 0222	C-555A/B - Vanillin Cold Traps	GRP000000013
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator	GRP000000013
EQT 0224	H-556 - Vacuum System	GRP0000000013
EQT 0225	C-634X - Dryer Scrubber	GRP000000013
EQT 0226	C-637X - Crystallization Vacuum Package Separator	GRP000000013
QT 0227	C-640 - Dryer	GRP0000000013
EQT 0228	C-805 - Solvent 3 Recovery Column	GRP000000013
EQT 0229	H-619 - Vacuum System	GRP000000013
EQT 0230	Y-620 - Centrifuge A	GRP000000013
EQT 0231	Y-621 - Centrifuge B	GRP000000013
EQT 0232	Y-640 - Dryer	GRP000000013
EQT 0233	C-606 - Guaiacol Distillation Column	GRP000000012
EQT 0234	C-683X - Guaiacol Vacuum Package Separator	GRP000000012
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps	GRP000000012
EQT 0236	C-754 - Veratrole Distillation Column	GRP000000012
EQT 0237	C-783X - Veratrole Vacuum Separator	GRP000000012
EQT 0238	C-787 - Veratrole Distillation Cold Traps	GRP000000012
EQT 0239	C-213 - First Reactor	GRP000000006
EQT 0240	C-215 - Second Reactor	GRP000000006
EQT 0241	C-217 - Third Reactor	GRP000000006
EQT 0242	C-219 - Fourth Reactor	GRP000000006
EQT 0243	C-231 - Fifth Reactor	GRP000000006
EQT 0244	C-501 - Detarring Column	GRP0000000006
EQT 0245	C-521 - Final Dephenoling Column	GRP0000000006
EQT 0246	E-418 - Phenol Condenser	GRP000000006
EQT 0247	H-524 - Vacuum System	GRP000000006
EQT 0248	C-301 - Water Stripper	GRP000000006
EQT 0249	C-313 - Extraction Column	GRP000000006

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### Group Membership:

ID	Description	Member of Groups
EQT 0250	C-405 - Dehydration Column	GRP000000006
EQT 0251	E-401 - Solvent Vent Condenser	GRP000000006
EQT 0252	C-536 - Splitter Column (PC/HQ Separation)	GRP000000006
EQT 0253	H-545 - Vacuum System	GRP000000006
EQT 0254	S-560 - PC Flaker	GRP000000006
EQT 0255	C-251 - Batch Reactor	GRP000000012
EQT 0256	H-640 - Vacuum System for Crystallizers	GRP000000006
EQT 0257	C-451 - Extraction Column	GRP000000012
EQT 0258	C-501 - Detheration Column	GRP000000012
EQT 0259	C-511 - Detheration Guaiacol Decanter	GRP000000012
EQT 0260	C-551 - Crude Gualacol Dehydration Column	GRP000000012
EQT 0261	C-555 - Wet Guaiacol Tank	GRP0000000012
EQT 0286	M-8A - Fire-Water Pump G972A	GRP000000022
EQT 0287	M-8B - Fire-Water Pump G972B	GRP000000022
FUG 0001	F-6V - F-6V, VANESSA FUGITIVE EMISSIONS	GRP000000013
FUG 0004	F-6C - F-6C, CATHY FUGITIVE EMISSIONS	GRP000000006
FUG 0005	F-6D - F-6D, DAPHNE FUGITIVE EMISSIONS	GRP000000012

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

#### Annual Maintenance Fee:

	Air Contaminant Source	Multiplier	Units Of Measure
0630	0630 Organic Oxides, Alcohols, Glycols (Rated Capacity)	88	MM lbs/yr

#### SIC Codes:

2819	Industrial inorganic chemicals, nec	Al 1314
2869	Industrial organic chemicals, nec	UNF 001

#### **EMISSION RATES FOR CRITERIA POLLUTANTS**

Al ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

	CO			NOx			PM10			SO2	·		VOC		eren transmir in title dat sensen alle inde de de-
Subject Item	Avg lb/hr	Max Ib/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max Ib/hr	Tons/Year
Cathyval Plant	1					-					·				
EQT 0009 101													0.04		0.16
EQT 0015			**************************************			<del> </del>							0.001		0.01
EQT 0019													0.01	0.02	0.05
EQT 0021													0.03	0.03	0.12
EQT 0028							· · · · · · · · · · · · · · · · · · ·	<b> </b>		<del></del>			0.12	0.18	0.53
EQT 0031			:										0.12		ļ
EQT 0040											<del></del>			0.82	0.90
107 EQT 0045	1											***************************************	<0.001	0.10	0.01
108 EQT 0051													0.002	0.002	0.01
109 EQT 0052			1				0.02	0.03	0.07						
201 EQT 0056													0.01		0.04
202 EQT 0075													0.16	1.12	0.78
EQT 0076							0.04	0.09	0.02						-
301													0.04	5.44	0.19
EQT 0082 302													80.0	16.04	0.34
EQT 0089 303													0.82	8.21	3.68
EQT 0094 304							-						0.01	0.30	0.05
EQT 0097 306													0.02	0.03	0.06
EQT 0106 307							0.001	0.002	<0.01	<b></b>					
EQT 0107 308							0.001	0.002	<0.01				******		
EQT 0109							0.001	0.001	<0.01					ļ	
EQT 0110	<b>+</b>						0,05	0.10	0,22	<u> </u>	<u></u>			<del> </del>	
EQT 0111							0.05	0.10	0.22				<b></b>		
EQT 0112		-					0.01	0.10	0.02				: :		

#### **EMISSION RATES FOR CRITERIA POLLUTANTS**

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

	co			NOx			PM10			SO2			Voc		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max Ib/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Cathyval Plant											1			:	
EQT 0113 315A	0.48	0,48	0.73	0.58	0.58	0.87	0.04	0.04	0.07	0.003	0.003	0.01	0.03	0.03	0.05
EQT 0114 315B	0.65	0.65	2.83	0.77	0.77	3.37	0.06	0.06	0.26	0.005	0.005	0.02	0.04	0.04	0.19
EQT 0115 316												 	<0.001	0.004	<0.01
EQT 0116 317		5					<0.001	0.40	<0.01						
EQT 0125 м-s						4 * · · · · · · · · · · · · · · · · · ·	0.21		0.92					<u> </u>	
EQT 0126 <sub>M-6</sub>											!		0.005		0.02
EQT 0139										**************************************	1		0.05	0.06	0.01
EQT 0288 <sub>M-9</sub>	1.48	1.48	0.30	6.88	6.88	1.38	0.49	0.49	0.10	0.46	0.46	0.09	0.56	0.56	0.11
FUG 0001 F-6V					<del> </del>								0.11		0.46
FUG 0004 F-60													0.26		1.12
FUG 0005 F-60												<u> </u>	0.13		0.59
GRP 0014 wwt	-						-					<u> </u>	4.01		17.55
GRP 0022 Fire Pump Diesel Engine	2.47	2.47	0.12	11.47	11.47	0.57	0.81	0.81	0.04	0.76	0.76	0.04	0.93	0.93	0.05

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

#### **EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year		
EQT 0009	Methanol	0.001	1	<0.01		
	Methyl isobutyl ketone	0.04		0.16		
EQT 0021	Methyl isobutyl ketone	0.03	0.03	0.12		
EQT 0028 105	Methanol	0.001	0.001	<0.01		
	Methyl isobutyl ketone	0.08	0.12	0.35		
EQT 0031	Methyl isobutyl ketone	0.21	0.82	0.90		
EQT 0040 107	Methyl isobutyl ketone	<0.001	0.10	0.01		
EQT 0045	Methanol	0.002	0.002	0.01		
EQT 0052	Pyrocatechol	0.01		0.03		
EQT 0056 202	Hydroquinone	0.001	0.05	<0.01		
	Methanol	0.001	0.005	<0.01		
	Pyrocatechol	0.01	0.05	0.02		
EQT 0075	Hydroquinone	0.04	0.09	0.02		
	Pyrocatechol	0.04	0.09	0.02		
EQT 0076	Hydroquinone	<0.001	0.04	<0.01		
	Phenol	0.04	4.93	0.17		
	Pyrocatechol	0.004	0.47	0.02		
EQT. 0082	Phenol	0.005	2.54	0.02		
EQT 0089	Phenol	<0.001	0.01	<0.01		
EQT 0094 04	Pyrocatechol	0.01	0.30	0.05		
QT 0097 06	Hydroquinone	0.01	0.02	0.04		
QT 0110	Pyrocatechol	0.05	0.10	0.22		
EQT 0111	Hydroquinone	0.05	0.10	0.22		
EQT 0112 13	Hydroquinone	0.01	0.01	0.02		
QT 0115	Hydroquinone	<0.001	0.004	<0.01		
QT 0116	Hydroquinone	<0.001	0.32	<0.01		
	Pyrocatechol	<0.001	0.08	<0.01		
QT 0126 1-6	Methyl isobutyl ketone	<0.001		<0.01		
	Phenol	<0.001		<0.01		
UG 0001 -6V	Methanol	0.04		0.18		
	Methyl isobutyl ketone	0.06		0.28		
UG 0004 -6C	Hydroquinone	0.003		0.01		
	Phenol	0.06		0.28		

# **EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
FUG 0004 F-6C	Pyrocatechol	0.003		0.01
FUG 0005 F-6D	Chloroethane	0.03		0.12
	Hydroquinone	0.001		0.01
	Methyl chloride	0.05		0.23
	Pyrocatechol	0.01		0.03
GRP 0014 wwt	Methanol	0.72		3.16
	Methyl isobutyl ketone	1.74		7.63
	Phenol	0.01		0.03
	Pyrocatechol	0.01		0.05
JNF 0001	Chloroethane			0.12
	Hydroquinone			0.36
	Methanol			3.38
	Methyl chloride			0.23
	Methyl isobutyl ketone			9.46
<b>~</b> ,	Phenol			0.52
	Pyrocatechol			0.46

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

### EQT 0009 101 - 101, LIGHTS TANK FARM SCRUBBER C-165

1	[LAC 33:III.2115.K.4]	Maintain records to demonstrate that the waste gas stream from methanol unloading (line purge) is less than 100 lbs/24-hour period. [LAC 33:III.2115.K.4, LAC 33:III.2115.H.1.c]
2	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
3	[LAC 33:III.501.C.6]	Flow rate >= 2.0 gallons/min. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
4	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
5	[LAC 33:111.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year). STATE ONLY.
6	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
7	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

### EQT 0010 D-148 - D-148, VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148

8 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
9 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in La

#### LAC 33:III.2103.I.1 - 7, as applicable.

### EQT 0011 D-149 - D-149, ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)

10	[LAC 33:111.2103,H,3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
11	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

### EQT 0012 D-152 - D-152, SOLVENT 2 TANK (MIBK STORAGE) D-152

12	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
13	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

# **EQT 0013** D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

### EQT 0013 D-153 - D-153, SOLVENT 2 TANK (MIBK STORAGE) D-153

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

[LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

#### EQT 0014 D-169 - D-169, SOLVENT 3 TANK (METHANOL STORAGE) D-169

16 [LAC 33:III.2103.A]	Equip with submerged fill pipe.
17 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

#### EQT 0015 102 - 102, HEAVIES TANK FARM SCRUBBER C-187

18	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
19	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
20	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
21	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
22	[LAC 33:III.501.C.6]	Flow rate >= 3.6 gallons/min. STATE ONLY.
	•	Which Months: All Year Statistical Basis: Four-hour average
23	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

## EQT 0016 D-107 (Vanessa) - D-107 (Vanessa), GUAIACOL STORAGE TANK D-107

- 24	[LAC 33;111.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:111.2103,H.3.a-e.
25	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7. as applicable.

### EQT 0017 D-111 (Vanessa) - D-111 (Vanessa), GUETOL STORAGE TANK D-111

26	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
27	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

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# EQT 0018 D-113 (Vanessa) - D-113 (Vanessa), GLYOXYLIC ACID STORAGE TANK D-113

28	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
29	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

# EQT 0019 103 - 103, CONDENSATION SCRUBBER C-201

	[LAC 33:III.2115.K] [LAC 33:III.501.C.6]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
	Ī.	Submit annual report to LDEQ by March 31st of each year listing hours that the scrubber operated out of range, STATE ONLY.
32	[LAC 33:III.501,C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
33	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
34	[LAC 33:III.501,C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.  Which Months: All Year Statistical Basis: None specified
35	[LAC 33:III.501.C.6]	Flow rate >= 2.1 gallons/min. STATE ONLY. Which Months: All Year Statistical Basis: Four-hour average

### **EQT 0020** C-216 - C-216, GUAIACOL RECYCLE TANK C-216

36	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
37	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.
38	[LAC 33:III.501.C.6]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
		for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are
		emitted from this tank. MACT is not required. STATE ONLY.

### **EQT 0021** 104 - 104, SOLVENT 1 VENT SCRUBBER C-248

39	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
		for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
		Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
40	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all
		organic contents and washed, STATE ONLY.
41	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division, STATE ONLY.

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#### **EQT 0021** 104 - 104, SOLVENT 1 VENT SCRUBBER C-248

42	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
43	[LAC 33:III.501.C.6]	Flow rate >= 1.95 gallons/min. STATE ONLY.
**		Which Months: All Year Statistical Basis: Four-hour average
44	[LAC 33:111.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution
		control system (DCS). STATE ONLY.
	•	Which Months: All Year Statistical Basis: None specified
45	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
		for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are

#### EQT 0022 C-236 - C-236, NEUTRALIZATION SURGE TANK C-236

46	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
47	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

#### EQT 0023 C-240 - C-240, EXTRACTOR TAILS UPSET TANK C-240

48	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
49	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

# EQT 0024 C-243 - C-243, EXTRACTOR 1 TAILS SAFETY DECANTER C-243

50 [LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0025 C-244 - C-244, MANDELATE SURGE TANK C-244

51 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
52 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

# EQT 0026 C-249 - C-249, SOLVENT 1 SURGE TANK C-249

53	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using	the methods in LAC 33:III.2103.H,3.a-e.
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emitted from this scrubber. MACT is not required.

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#### EQT 0026 C-249 - C-249, SOLVENT 1 SURGE TANK C-249

54 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

#### EQT 0027 C-247 - C-247, SOLVENT 1 WASHING SAFETY DECANTER C-247

55 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### **EQT 0028 105 - 105, OXIDATION SCRUBBER C-419**

56	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
57	[LAC 33:III.501.C.6]	Flow rate >= 18.0 gallons/min. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
58	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution
		control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
59	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
60	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
61	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
62	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

#### EQT 0029 C-409 - C-409, MANDELATE SURGE TANK C-409

63 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
64 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

### **EQT 0030 C-417 - D-417, OXIDATION SURGE TANK D-417**

65 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

# **EQT 0030** C-417 - D-417, OXIDATION SURGE TANK D-417

66 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

# EQT 0031 106 - 106, VANILLIN EXTRACTION SCRUBBER C-427

		· · · · · · · · · · · · · · · · · · ·
67	[LAC 33:III.2103.I,3]	Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities.
68	[LAC 33:III.2103.I.7]	Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not met.
69	[LAC 33:III.2115.B]	Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.  Which Months: All Year Statistical Basis: None specified
70	[LAC 33:III.2115.J.1]	Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
71	[LAC 33:III.2115.J.2]	Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC.
72	[LAC 33:III.2115.J]	33:III.2115.J.2.a through e.  Comply with LAC 33:III.2115 as soon as practicable but in no event later than August 20, 2003. Comply with the requirements of LAC 33:III.2115 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC
73	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to
74	[LAC 33:III.501.C.6]	representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.  Temperature <= 42 F. Temperature of scrubber water feed shall be maintained, except when oxidation/neutralization section is shutdown.  Which Months: All Year Statistical Basis: Daily average
75	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.
76	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency based on the DCS. Which Months: All Year Statistical Basis: None specified
77	[LAC 33:HI.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.
78	[LAC 33:III.501.C.6]	Flow rate >= 2.4 gallons/min. Which Months: All Year Statistical Basis: Daily average
79	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

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80	[LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or	
-81	[LAC 33:III.2103.E.1]	sampling is taking place.  VOC, Total >= 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.	f
		Which Months: All Year Statistical Basis: None specified	

# EQT 0033 C-430 - C-430, SOLVENT 2 DECANTER C-430

82	[LAC 33:III.2115.B]	Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
:		Which Months: All Year Statistical Basis: None specified
83	[LAC 33:III.2115.J.1]	Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
84	[LAC 33:III.2115.J.2]	Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
85	[LAC 33:111.2115.K.4]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request

# EC

EQT	0034 C-432 - C-432, EXTR	ACTION 2 DRAIN TANK C-432
86	[LAC 33:III.2103,A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or
		sampling is taking place.
87	[LAC 33:III,2103.E.1]	VOC, Total >= 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.  Which Months: All Year Statistical Basis: None specified

### EQT 0035 C-434 - C-434, EXTRACTION 2 TAILS SAFETY DECANTER C-434

88	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
		for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
		Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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### EQT 0036 C-441 - C-441. AQUEOUS PHASE SURGE TANK C-441

89 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

[LAC 33:III.2103.E.1] VOC, Total >= 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of

planned routine maintenance which may not exceed 240 hours per year.

Which Months: All Year Statistical Basis: None specified

#### EQT 0037 C-501 - C-501, SOLVENT 2 DISTILLATION SURGE TANK C-501

91 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

92 [LAC 33:III.2103.E.1] VOC, Total >= 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.

Which Months: All Year Statistical Basis: None specified

#### EQT 0038 C-558 - C-558, AQUEOUS EFFLUENTS TANK C-558

93 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

94 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0039 C-575 - C-575, SOLVENT 2 RECOVERY DECANTER C-575

95 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0040 107 - 107, DISTILLATION SCRUBBER C-557

96 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

[LAC 33:III.501,C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.

[LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution

control system (DCS), STATE ONLY,

Which Months: All Year Statistical Basis: None specified

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2

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#### EQT 0040 107 - 107, DISTILLATION SCRUBBER C-557

99	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all
		organic contents and washed. STATE ONLY.
100	[LAC 33:III.501.C.6]	Flow rate >= 1.0 gallons/min. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
101	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division, STATE ONLY.
102	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
		for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are
	·	emitted from this scrubber. MACT is not required.

#### **EQT 0041** C-535 - C-535, TARS SURGE TANK C-535

103	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
104	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

#### **EQT 0042** C-616 - C-616, FLAKER SURGE TANK C-616

105 [LAC 33:111.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
106 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

# EQT 0043 C-648 - C-648, RECYCLE PRODUCT HOPPER MELTER C-648

107	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
		for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
		Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### **EQT 0044** C-655 - C-655, MELTER SURGE TANK C-655

108	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
109	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

### EQT 0045 108 - 108, CRYSTALLIZATION SCRUBBER C-624

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### EQT 0045 108 - 108, CRYSTALLIZATION SCRUBBER C-624

VOC, Total >= 95 % control efficiency. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year. Which Months: All Year Statistical Basis: None specified Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities. Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not met. Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being me for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of t Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request. Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). Which Months: All Year Statistical Basis: None specified Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. Flow rate >= 2.1 gallons/min. Which Months: All Year Statistical Basis: Four-hour average Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class II TAPs are		<del></del>	
Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities.  Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not met.  Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being me for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of t Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.  Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).  Which Months: All Year Statistical Basis: None specified  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate > 2.1 gallons/min.  Which Months: All Year Statistical Basis: Four-hour average  Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are	110	[LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities.  Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not met.  Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being me for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of t Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.  Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).  Which Months: All Year Statistical Basis: None specified  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate > 2.1 gallons/min.  Which Months: All Year Statistical Basis: Four-hour average  Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are			
control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not meet.  Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being me for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.  Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).  Which Months: All Year Statistical Basis: None specified  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate >= 2.1 gallons/min.  Which Months: All Year Statistical Basis: Four-hour average  Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are	111	[LAC 33:III.2103.I.3]	Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC
for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.  Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS).  Which Months: All Year—Statistical Basis: None specified  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate >= 2.1 gallons/min.  Which Months: All Year—Statistical Basis: Four-hour average  Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are		,	control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending
Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).  Which Months: All Year Statistical Basis: None specified Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate >= 2.1 gallons/min.  Which Months: All Year Statistical Basis: Four-hour average  Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are	113	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate >= 2.1 gallons/min.  Which Months: All Year Statistical Basis: Four-hour average  Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are	114	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution
Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.  Flow rate >= 2.1 gallons/min.  Which Months: All Year Statistical Basis: Four-hour average  Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are			Which Months: All Year Statistical Basis: None specified
Flow rate >= 2.1 gallons/min. Which Months: All Year Statistical Basis: Four-hour average Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are	115	[LAC 33:III.501.C.6]	
Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are	116	[LAC 33:III.501.C.6]	Flow rate >= 2.1 gallons/min.
[LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are	117	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all
	118	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are

# EQT 0046 C-541 - C-541, METHANOL WASHING DRUM C-541 (Vents through C-801)

119 [LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# **EQT 0047** C-801 - C-801, SOLVENT 3 RECOVERY FEED TANK C-801

120 [LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or
	sampling is taking place.
121 [LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency using a vapor loss control system (scrubber). This limitation does not apply during periods of planned
	routine maintenance which may not exceed 240 hours per year.
•	Which Months: All Year Statistical Basis: None specified

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Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### EQT 0048 C-603 - C-603, DISOLVER C-603

122	LAC	33:III	.21	15.	K1
122	D: 10	~~		• • •	

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### **EQT 0049** C-606 - C-606, VACUUM CRYSTALLIZER C-606

123	[LAC	33:111	.21	15.	K1
120	10,10		• • •	• • •	•••

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### **EQT 0050** C-617 - C-617, CENTRIFUGE SURGE TANK C-617

124 [LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or
125 [LAC 33:III.2103.E.1]	sampling is taking place.  VOC, Total >= 95 % control efficiency using a vapor loss control system (scrubber). This limitation does not apply during periods of planned
	routine maintenance which may not exceed 240 hours per year. Which Months: All Year Statistical Basis: None specified

#### EQT 0051 109 - 109, BAGHOUSE FILTER/SCRUBBER C-704

126	[LAC 33:III.1305]	Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.
127	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy once every four hours based on the DCS. STATE ONLY.
128	[LAC 33:III.501.C.6]	Particulate matter (10 microns or less): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III.Chapter 13. STATE ONLY.
129	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
130	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed, STATE ONLY.
131	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
132	[LAC 33:III.501.C.6]	Flow rate >= 175.0 gallons/min with excess NaOH. STATE ONLY. Which Months: All Year Statistical Basis: Four-hour average

#### EQT 0052 201 - 201, TANK FARM SCRUBBER C-146

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

# EQT 0052 201 - 201, TANK FARM SCRUBBER C-146

133	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
134	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
•		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
-135	[LAC 33:III.501.C.6]	Flow rate >= 1.4 gallons/min. STATE ONLY.
126	Fr + G 22 *** 52 + G 5	Which Months: All Year Statistical Basis: Four-hour average
136	[LAC 33;III.501,C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all
127	(f A C T2 III col C c)	organic contents and washed. STATE ONLY.
137	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution
		control system (DCS). STATE ONLY.
138	[LAC 33:III.5109.A]	Which Months: All Year Statistical Basis: None specified
150		Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
		for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are
	•	emitted from this scrubber for which permitted site-wide emissions are greater than MER. MACT is not required.

# EQT 0053 D-111 (Daphne) - D-111 (Daphne), PYROCATECHOL STORAGE TANK

139 [LAC 33:III.2103.H	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
140 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7. as applicable.

# **EQT 0054** D-128 - D-128, TARS STORAGE TANK D-128

	thods in LAC 33:III.2103.H.3.a-e.
142 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or h 33:III.2103.I.1 - 7, as applicable.	nard copy continuously. Keep records of the information specified in LAC

# EQT 0055 D-141 - D-141, VERATROLE STORAGE TANK D-141

143	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
144	[LAC 33:HI.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

### **EQT 0056** 202 - 202, VENT SCRUBBER C-685

145 [LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

EQT 0056 202 - 202, VENT SCRUBBER C-685	EQT 0056	202 - 202.	VENT	<b>SCRUBBER C-685</b>
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146	[LAC 33:III.2147]	LAC 33:III.Chapter 21, Subchapter J - Limiting VOC Emissions from Reactor Processes and Distillation Operations in the SOCMI. Daphne is subject to LAC 33:III.2147 only if/when producing anisole. Daphne does not currently produce anisole. Before beginning anisole production, Rhodia will determine the applicability of all vents. For all subject vents, Rhodia will come into compliance with LAC 33:III.2147 prior to the startup of anisole campaign.
147	[LAC 33:III.501.C.6]	Flow rate >= 7.0 gallons/min. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
148	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
149	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
150	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
151	[LAC 33:III.501,C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
152	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

# EQT 0057 C-201 - C-201, PC DISSOLUTION TANK C-201

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153	[LAC 33:III.2149.C.1]		VOC, Total >= 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by
			controlling only C 251 and C 201 with greater than 000% officiant. He did not be a controlling only C 351 and C 201 with greater than 000% officiant. He did not be a controlling only C 351 and C 301 with greater than 000% officiant.
			controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.
			[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
			Which Months: All Year Statistical Basis: None specified
154	[LAC 33:III.2149.G.1.b	]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average
			flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

# EQT 0058 C-553 - C-553, GUAIACOL DISTILLATION FEED TANK C-553

155 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
156 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
:	33:III.2103.I.1 - 7, as applicable.

### EQT 0059 C-561 - C-561, RECYCLE PROCESS WATER TANK C-561

157	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
121	[0.10 33.111.2103.11.3]	Determine you maximum due vapor pressure using the methods in EAC 33111.2103.H.3.a-e.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### **EQT 0059** C-561 - C-561, RECYCLE PROCESS WATER TANK C-561

158 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0060 C-603 - C-603, GUAIACOL DISTILLATION KETTLE C-603

159 [LAC 33:III.2149.C.1]

VOC, Total >= 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.

[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]

Which Months: All Year Statistical Basis: None specified

160 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average

flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

#### **EQT 0061** C-615 - C-615, TARS RECEIVER C-615

161 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3,a-e.

162 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### **EQT 0062** C-645 - C-645, PMDB RECEIVER C-645

163 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

164 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III,2103.I.1 - 7, as applicable.

### EQT 0063 C-651 - C-651, PC RECEIVER C-651

165 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

166 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### **EQT 0064** C-655 - C-655, GUAIACOL LT. ENDS RECEIVER C-655

167 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

168 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2

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EQT 0065 C-	-660 - C-660,	INTERS.	/VERATROLE	RECEIVER	C-660
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169 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

170 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0066 C-665 - C-665, SECOND RECEIVER C-665

171 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

172 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0067 C-670 - C-670, END OF CAMPAIGN RECEIVER C-670

73 [LAC 33:III,2103,H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

174 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0068 C-675 - C-675, GUAIACOL RECEIVER C-675

175 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

176 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0069 C-701 - C-701, CRUDE VERATROLE WASH TANK C-701

177 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average

flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

### EQT 0070 C-705 - C-705, WATER GUAIACOLATE RECEIVER C-705

178 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

179 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### **EQT 0071** C-710 - C-710, CAUSTIC WASH RECEIVER C-710

180 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

181 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### EQT 0072 C-751 - C-751, VERATROLE DISTILLATION KETTLE C-751

182 [LAC 33:III.2149.G.1.b]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average
	flow rate in standard cubic feet per minute (scfm), and documentation verifying these values

#### **EQT 0073** C-765 - C-765, LT. ENDS RECEIVER C-765

183 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
184 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
4	33;III.2103.I.1 - 7, as applicable.

# EQT 0074 C-770 - C-770, DISTILLED VERATROLE RECEIVER C-770

185 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
186 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

# EQT 0075 203 - 203, BAGHOUSE FOR HQ HANDLING

187	[LAC 33:III.1305]	Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to,
188	[LAC 33:III.501,C.6]	those specified in LAC 33:III.1305.1-7.  Particulate matter (10 microns or less): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of
		LAC 33:III.Chapter 13. STATE ONLY.
189	[LAC 33:III.501.C.6]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are
		emitted from this baghouse. Determined to be MACT. STATE ONLY,

# EQT 0076 301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)

190	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
	•	Which Months: All Year Statistical Basis: None specified
191	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
192	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all
		organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits.
193	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
194	[LAC 33:III.501.C.6]	Flow rate >= 0.46 gallons/min. STATE ONLY.
		Which Months: All Vear Statistical Racis: Four-hour average

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Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### EQT 0076 301 - 301, PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)

195 [LAC 33:III.501.C.6]

For up to 70 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove

pluggage and restore proper operation. STATE ONLY.

196 [LAC 33:III.5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which

site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

#### EQT 0077 C-223 - C-223, PHENOL DRAIN TANK REACTION SURGE DRUM C-223

197 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0078 C-416 - C-416, PREDEPHENOL REFLUX DRUM C-416

198 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0079 C-508 - C-508, VERTICAL TAR DILUTER C-508

199 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0080 C-530 - C-530, DISTILLATION DRAN TANK C-530

200 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0081 C-532 - C-532, TAILS SURGE DRUM C-532

201 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0082 302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

# EQT 0082 302 - 302, OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)

202	[LAC 33:III.2115.B]	Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
202	57 1 G 90 777 011 0 11	Which Months: All Year Statistical Basis: None specified
203	[LAC 33:III.2115.J.1]	Demonstrate compliance with LAC 33:III,2115 as requested by DEQ.
204	[LAC 33:III.2115.J.2]	Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the
		proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
205	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to
206	[LAC 33:III.501.C.6]	representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.  Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).
	•	Which Months: All Year Statistical Basis: None specified
207	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all
		organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year).
208	[LAC 33:III.501.C.6]	For up to 16 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation.
209	[LAC 33:III.501.C.6]	Flow rate >= 7.6 gallons/min.
210	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: Four-hour average
	·	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on DCS.
211	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which
		site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

# EQT 0083 C-113 - C-113, PHENOL UNLOADING TANK C-113

212 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# **EQT 0084** D-107 - D-107, WASHWATER TANK D-107

213 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### EQT 0084 D-107 - D-107, WASHWATER TANK D-107

214 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

#### EQT 0085 D-111 - D-111, PHENOL MAKE-UP TANK D-111

215 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

216 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0086 D-115 - D-115, WASHWATER/GUAIACOL TANK D-115

217 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3,a-e.

218 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0087 D-315 - D-315, RAFFINATE TANK D-315

219 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent (Note: this requirement does not apply if the unit is shut down and D-315 emits only breathing losses [less than 100 lbs in 24 hours]). Which Months: All Year Statistical Basis: None specified

### EQT 0088 D-204 - D-204, RECYCLE PHENOL TANK D-204

220 [LAC 33:III.2115.K]

T AC 22-111 2142 E 41

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0089 303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)

221 [LAC 33	:III.2147.E.4]	Equipment/operational data recordkeeping by electronic or hard copy as needed Install, calibrate, maintain and operate monitoring device(s) on
		scrubber C-402 and/or condenser E-401 as approved by LDEQ Engineering to demonstrate compliance with TRE index limit specified under
	ř.	LAC 33:III.2147.C.2.
222 [LAC 33	:III.501.C.6]	Flow rate >= 4.0 gallons/min.
		Which Months: All Year Statistical Basis: Four-hour average
223 [LAC 33	:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

### EQT 0089 303 - 303, IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)

224 [LAC 33:III.501.C.6]	Flow rate monitored by flow i	rate monitoring device at the approved fre	equency, i.e. four hour block average ba	sed on the plant's distribution
	control system (DCS)		_	

Which Months: All Year Statistical Basis: None specified

225 [LAC 33:III.501.C.6] Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all

organic contents and washed or (2) have their vent line valve closed such that no emissions occur.

226 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for

which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

#### EQT 0090 C-320 - C-320, IPE STORAGE TANK C-320

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0091 C-308 - C-308, IPE SETTLER C-308

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0092 C-311 - C-311, WASHWATER DRUM C-311

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0093 C-322 - C-322, ETHER DRAIN TANK C-322

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0094 304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)

231 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

EQT 0094 304 - 304, PC FLAKER VENT SCRUBBER C-561 (P&I.D. F50
---------------------------------------------------------------

232	[LAC 33:111.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
233	[LAC 33:III.501.C.6]	For up to 16 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove
		pluggage and restore proper operation. STATE ONLY.
234	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all
		organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits. STATE ONLY.
235	[LAC 33:III.501.C.6]	Flow rate >= 0.22 gallons/min. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
236	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
237	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
		for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are
		emitted from this scrubber. MACT is not required.

### EQT 0095 C-551 - C-551, PC RECEIVING DRUM C-551

238 [LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0096 C-563 - C-563, PC FLAKER FEED TANK C-563

239 [LAC 33:III.21	15.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0097 306 - 306, SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)

240 [LAC 33:III.2115.K.4]	Maintain records to demonstrate that each vent routed to the seal pot is less than 100 lbs/24-hour period. [LAC 33:III.2115.K.4, LAC
	33:HI.2115.H.1.cl

### EQT 0098 C-650 - C-650, REFLUX SURGE DRUM C-650

241 [LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

### **EQT 0099** D-607 - D-607, HQ DISSOLVER TANK D-607

242 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0100 D-610 - D-610, HQ SURGE TANK D-610

243 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### **EQT 0101** D-612 - D-612, CARBON TREATER TANK D-612

244 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0102 D-632 - D-632, CRYSTALLIZATION TANK D-632

245 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0103 D-652 - D-652, MOTHER LIQUOR SURGE TANK D-652

246 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### **EQT 0104** D-653 - D-653, CONC. COLUMN FEED TANK D-653

247 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0105 D-657 - D-657, MOTHER LIQUOR SURGE DRUM D-657

248 [LAC 33:III.2115.K]

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### EQT 0106 307 - 307, SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601

249 [LAC 33:III.501.C.6]

Particulate matter (10 microns or less): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of

LAC 33:III.Chapter 13. STATE ONLY.

#### EQT 0107 308 - 308, OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)

250 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III. Chapter 13.

251 [LAC 33:III.501.C.6]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are

emitted from this source. Determined to be MACT, STATE ONLY,

#### EQT 0109 310 - 310, CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)

252 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

#### EQT 0110 311 - 311, PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)

253 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

#### EQT 0111 312 - 312, HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)

254 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

255 [LAC 33:III.5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are

emitted from this source. MACT is not required.

#### EQT 0112 313 - 313, HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)

256 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

257 [LAC 33:III.5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

### EQT 0113 315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)

258 [LAC 33:III.1101.B]

Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: None specified

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

### EQT 0113 315A - 315A, FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)

259 [LAC 33:III.1313.C] Total suspended particulate <= 0.6 lb/MMBTU of heat input. Which Months: All Year Statistical Basis: None specified

260 [LAC 33:III.1513] Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data

required to demonstrate exemption from the provisions of LAC 33:III. Chapter 15. Record all emissions data in the units of the standard using

the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.

# EQT 0114 315B - 315B, PRIMARY FLUID HEATER F-971 (P&I.D. F925)

261 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator,

equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute

period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: None specified Total suspended particulate <= 0.6 lb/MMBTU of heat input.

Which Months: All Year Statistical Basis: None specified

263 [LAC 33:III.1513] Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data

required to demonstrate exemption from the provisions of LAC 33:III. Chapter 15. Record all emissions data in the units of the standard using

the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.

# EQT 0116 317 - 317, VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)

264 [LAC 33:III.1311.B] Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

### EQT 0118 401A - 401A, WWT TANK NO. 28 (P&I.D. F101)

[LAC 33:III.1313.C]

262

265 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

266 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information

specified in LAC 33:III.2103.I.1 - 7, as applicable.

267 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC

33:III.2153.F.1, LAC 33:III.2153.G]

### EQT 0119 401B - 401B, STORMWATER TANK NO. 29 (P&I.D. F101)

268 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

269 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information

specified in LAC 33:III.2103.I.1 - 7, as applicable.

270 [LAC 33:III.2153.F.1] Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC

33:III.2153.F.1, LAC 33:III.2153.G]

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

EQT 0120	401C - 4	101C.	<b>TANK</b>	D-197
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271	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
272	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
273	[LAC 33:111.2153.F.1]	specified in LAC 33:III.2103.I.1 - 7, as applicable.  Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

# **EQT 0121** 402A - 402A, WEST AERATION BASIN D210

274	[LAC 33:III.2153.F.1]	Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC
		33:III.2153.F.1, LAC 33:III.2153.G]

# EQT 0122 402B - 402B, EAST AERATION BASIN D213 (P&I.D. F201)

275 [LAC 33:III.2153.F.1]	Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC
	33:III.2153.F.1, LAC 33:III.2153.G]

### EQT 0123 402C - 402C, WEST CLARIFIER D301 (P&I.D. F302)

276 [LAC 33:I	II.2153.F.1]	Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [	[LAC
		33:III.2153.F.1, LAC 33:III.2153.G]	•

### EQT 0124 402D - 402D, EAST CLARIFIER D304 (P&I.D. F302)

277	[LAC 33:III.2153.F.1]	Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC
		33:III.2153.F.1, LAC 33:III.2153.G]

### EQT 0125 M-5 - M-5, CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)

278 [LAC 33:111.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
	for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No additional controls are required.

# **EQT 0127** C-101 - C-101, IPE SOLVENT STORAGE TANK C-101

279 [LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor
	disposal system capable of processing such organic vapors (combustion). All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
280 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

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#### EQT 0127 C-101 - C-101, IPE SOLVENT STORAGE TANK C-101

281 [LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or
	current permit

#### EQT 0128 C-351 - C-351, RAG LAYER DIVERTING TANK C-351

282 [LAC 33:111.2149.G.1.b]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average
	flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.
202 [[ ] ] ( ) 22.111 ( ) ( ) ( ) ( )	

283 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or

current permit.

#### EQT 0129 C-401 - C-401, AQUEOUS PHASE SURGE TANK C-401

284 [LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor
	disposal system capable of processing such organic vapors (combustion). All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
285 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.
286 [LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

# EQT 0130 C-352 - C-352, RAG LAYER SURGE TANK C-352

287 [LAC 33:III.2103.A]	Equip with submerged fill pipe.
288 [LAC 33:İII.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
<u> </u>	33:III.2103.I.1 - 7, as applicable
289 [LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or
	current permit

### **EQT 0131** C-461 - C-461, AQUEOUS EFFLUENT TANK C-461

290	[LAC 33:III.2103.A]	Equip with submerged fill pipe.
291	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.
292	FLAC 33:111:501 C 61	Emissions routed to Rhodia's Sulfuric Acid Plant Regeneration Formaces Unit 1 or 2 permitted under Part 70 Permit No. 0940 00022 3/2

EQT 0132 C-521 - C-521, ORGANIC PHASE SURGE TANK C-521

current permit.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

### **EQT 0132** C-521 - C-521, ORGANIC PHASE SURGE TANK C-521

293	[LAC 33:III.2103.A]	Equip with submerged fill pipe.
294	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
295	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.
EQT	0133     C-132 - C-132, MeCl	STORAGE TANK C-132
296	[LAC 33:III.2103.A]	Equip with submerged fill pipe.
297	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
298	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.
EQT	0134   C-136 - C-136, EtCl	STORAGE TANK C-136
299	[LAC 33:III.2103.A]	Equip with submerged fill pipe.
300	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
301	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.
EQT	 <u>0135</u> C-301 - C-301, ACID	IFICATION/DECANTATION TANK C-301
302	[LAC 33:III.2149.C.1]	VOC, Total >= 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable. [LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f] Which Months: All Year Statistical Basis: None specified
303	[LAC 33:III.2149.G.1.b]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfin), and documentation verifying these values.
304	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

## EQT 0136 C-503 - C-503, DEETHERATION IPE DECANTER C-503

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

# EQT 0136 C-503 - C-503, DEETHERATION IPE DECANTER C-503

305 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

Which Months: All Year Statistical Basis: None specified

306 [LAC 33:III.501.C.6]

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

# EQT 0137 D-681 - D-681, SCREENER RESIDUE DISSOLVER D-681

307 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0139 110 - 110, HIGH PURITY PC MIXING VESSEL

308 [LAC 33:III.2115.K.4]

Maintain records to demonstrate that the criteria are being met for any exemption claimed.

# EQT 0188 C-202 - Premixing Reactor

309 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0189 C-207 - Veratrole Stripper

310 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0190 C-217 - No. 1 Condensation Reactor

311 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0191 C-219 - No. 2 Condensation Reactor

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#### EQT 0191 C-219 - No. 2 Condensation Reactor

312 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0192 C-221 - No. 3 Condensation Reactor

313 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0193 C-223 - No. 4 Condensation Reactor

314 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0194 C-225 - No. 5 Condensation Reactor

315 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0195 C-227 - Polishing Reactor

316 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0196 C-241 - Guaiacol Extraction Column

317 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0197 C-245 - Solvent 1 Washing Column

318 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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#### EQT 0198 C-301 - Guaiacol Recovery Column

319 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0199 C-306 - Guaiacol/Tars Separator

320 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0200 C-312 - Solvent 1Stripper Decanter

321 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0201 C-314 - Solvent 1Stripper

322 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0202 C-316 - Solvent 1 Cold Trap

323 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0203 C-320 - Guaiacol Distillation Reflux Drum

324 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0204 C-322X - Solvent 1 Vacuum Package Separator

325 [LAC 33:III.2115.K]

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2

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<b>EQT 0205</b>		

326 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0206 C-407 - Oxidation Reactor

327 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0207 C-416 - Oxidation Column

328 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0208 C-429 - CO2 Separator

329 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

Which Months: All Year Statistical Basis: None specified

330 [LAC 33:III.2115.J.1]

Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.

331 [LAC 33:IJI.2115.J.2]

Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC

33:III.2115.J.2.a through e.

332 [LAC 33:III.2115.K.4]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the

Environmental Protection Agency upon request.

#### EQT 0209 C-435 - Vanillin Extraction Column

333 [LAC 33:III.2115.K]

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2

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#### EQT 0210 C-441 - Solvent 2 Washing Column

334 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0211 C-504 - Vanillin/Solvent 2 Atm. Distillation Column

335 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0212 C-507 - Vanillin/Solvent 2 Vacuum Distillation Column

336 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0213 C-516 - Solvent 2 Cold Trap

337 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0214 C-533X - Solvent 2 Vacuum Package Separator

338 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0215 C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)

339 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0216 C-568 - Solvent 2 Recovery Column (Top Rectification)

340 [LAC 33:III.2115.K]

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2

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<b>EQT 0217</b>	E-428 -	Condenser
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[LAC 33:III.2115.B]	Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or
	thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal
	efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume,
	whichever is less stringent.
	Which Months: All Year Statistical Basis: None specified
[LAC 33:III.2115.J.1]	Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
[LAC 33:III.2115.J.2]	Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
[LAC 33:III.2115.K.4]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
	[LAC 33:III.2115.J.1] [LAC 33:III.2115.J.2]

### EQT 0218 H-520 - Vacuum System

345	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0219 C-525 - Tars Removal Column

346 [LAC 33:III.21		met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of	of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.	

### EQT 0220 C-525 - Tars By-Pass Tank

347 [LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0221 C-545 - Lights Removal Column

348 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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#### EQT 0222 C-555A/B - Vanillin Cold Traps

349 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0223 C-562X - Vanillin Purification Vacuum Package Separator

350 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0224 H-556 - Vacuum System

351 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0225 C-634X - Dryer Scrubber

352 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0226 C-637X - Crystallization Vacuum Package Separator

353 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0227 C-640 - Dryer

354 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0228 C-805 - Solvent 3 Recovery Column

355 [LAC 33:III.2115.K]

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### EQT 0229 H-619 - Vacuum System

356 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0230 Y-620 - Centrifuge A

357 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0231 Y-621 - Centrifuge B

358 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0232 Y-640 - Dryer

359 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0233 C-606 - Guaiacol Distillation Column

360 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (sofm), and documentation verifying these values.

#### EQT 0234 C-683X - Guaiacol Vacuum Package Separator

361 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

### EQT 0235 C-687A/B - Guaiacol Distillation Cold Traps

362 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

#### EQT 0236 C-754 - Veratrole Distillation Column

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### EQT 0236 C-754 - Veratrole Distillation Column

363 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

#### EQT 0237 C-783X - Veratrole Vacuum Separator

364 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

# EQT 0238 C-787 - Veratrole Distillation Cold Traps

365 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfin), and documentation verifying these values.

#### EQT 0239 C-213 - First Reactor

366 [LAC 33:III.2147.C.2]

Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.

367 [LAC 33:III.2147.D.7]

Which Months: All Year Statistical Basis: None specified

368 [LAC 33:III.2147.F]

Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

#### EQT 0246 E-418 - Phenol Condenser

369 [LAC 33:III.2147.C.2]

Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.

Which Months: All Year Statistical Basis: None specified

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

## EQT 0246 E-418 - Phenol Condenser

370	[LAC 33:III.2147.D.7]	Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or
371	[LAC 33:III.2147.F]	more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.  Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

## EQT 0247 H-524 - Vacuum System

372 [LAC 33:III.2147.C.2]	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
373 [LAC 33:III.2147.D.7] 374 [LAC 33:III.2147.F]	Which Months: All Year Statistical Basis: None specified Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations. Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

#### EQT 0251 E-401 - Solvent Vent Condenser

375	[LAC 33:III.2147,C.2]	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or
		without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC
		33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in
		LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without
		the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC
		33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in
		LAC 33:III.2147.D.5.
_		Which Months: All Year Statistical Basis: None specified
376	[LAC 33:III.2147.D.7]	Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or
		more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
377	[LAC 33:III.2147.F]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2147.F.1 through F.4, as applicable.
378	ILAC 33:III.501.C.61	The condenser is equipped with a high temperature alarm. The maximum temperature of the water supplied to the condenser shall be maintained
		at 13 degrees Celsius based on a four hour average.

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#### EQT 0251 E-401 - Solvent Vent Condenser

379 [LAC 33:I	II.501.C.6	1
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Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) have their vent line valve closed such that no emissions occur.

#### EQT 0253 H-545 - Vacuum System

380	[LAC 33:III.2147.C.2]	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
381	[LAC 33:III.2147.D.7]	Which Months: All Year Statistical Basis: None specified  Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or

382 [LAC 33:III.2147.F]

Recalculate the flow rate, IOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2147.F.1 through F.4, as applicable.

current permit,

#### EQT 0254 S-560 - PC Flaker

383 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0255 C-251 - Batch Reactor

-41	ozoo o zon - Batch Ke	actor
384	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
		for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
206	ET A C 22 TY 0140 C 12	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
385	[LAC 33:III.2149.C.1]	VOC, Total >= 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the
		pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by
		controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.
	•	[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
		Which Months: All Year Statistical Basis: None specified
386	[LAC 33:III.2149.G.1.b]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average
		flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.
387	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or

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Air - Title V Regular Permit Renewal

EQT 0256 H-640 - Vacuum System for Crystallizers
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388 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0257 C-451 - Extraction Column

389 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

390 [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None specified

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

#### EQT 0258 C-501 - Detheration Column

391 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less

stringent.

Which Months: All Year Statistical Basis: None specified

392 [LAC 33:III.501.C.6]

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

#### EQT 0259 C-511 - Detheration Guaiacol Decanter

393 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less

stringent.

Which Months: All Year Statistical Basis: None specified

394 [LAC 33:III.501.C.6]

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

#### EQT 0260 C-551 - Crude Guaiacol Dehydration Column

395 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

Which Months: All Year Statistical Basis: None specified

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Air - Title V Regular Permit Renewal

#### EQT 0260 C-551 - Crude Guaiacol Dehydration Column

396 [LAC 33:III.501.C.6]

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

#### EQT 0261 C-555 - Wet Guaiacol Tank

397	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
398	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
		specified in LAC 33:III.2103.I.1 - 7, as applicable.
399	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit

# EQT 0288 M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump

400	[40 CFR 63.6595(a)(1)]	40 CFR 63 Subpart ZZZZ requirements become effective May 3, 2013. [40 CFR 63.6595(a)(1)]
401	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first.
		Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
402	[40 CFR 63.6603(a)]	Which Months: All Year Statistical Basis: None specified
102	[10 20 00 000000000000000000000000000000	Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
		Which Months: All Year Statistical Basis: None specified
403	[40 CFR 63.6603(a)]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of
	510 mm is 2222	the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
404	[40 CFR 63.6603(a)]	Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
405	[40 CFR 63.6605(a)]	Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
406	[40 CFR 63.6605(b)]	Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
407	[40 CFR 63.6625(e)]	Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written
	•	instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
408	[40 CFR 63.6625(f)]	Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
409	[40 CFR 63.6640(a)]	Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a
		and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ [40 CFR 63.6640(a)]
410	[40 CFR 63.6640(f)(1)ii]	Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing

to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

# EQT 0288 M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump

411	[40 CFR 63.6640(f)(1)iii]	Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
412	[40 CFR 63.6655]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
413	[LAC 33;III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
414	[LAC 33:III.1311.C]	Which Months: All Year Statistical Basis: None specified  Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  Which Months: All Year Statistical Basis: Six-minute average

# EQT 0289 E-318 - Predephenoling Vent Condenser

415 [LAC 33:III.501.C.6]	Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year if downstream scrubber is also off).
416 [LAC 33:III.501.C.6]	The condenser is equipped with a high temperature alarm. The maximum temperature of the water supplied to the condenser shall be maintained at 13 degrees Celsius based on a four hour average.

# FUG 0001 F-6V - F-6V, VANESSA FUGITIVE EMISSIONS

417 [L	AC 33:III,2111]	Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling
418 (L.	AC 33:III.5109.A]	conditions with mechanical seals or other equivalent equipment.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

# FUG 0004 F-6C - F-6C, CATHY FUGITIVE EMISSIONS

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

#### FUG 0004 F-6C - F-6C, CATHY FUGITIVE EMISSIONS

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419	[LAC 33:III.2111]	Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
420	[LAC 33:III.2122.C.1.c]	Repair according to LAC 33:III.2122.C.3 any regulated component observed leaking by sight, sound, or smell, regardless of the leak's concentration, except those covered under LAC 33:III.2122.C.1.d.
.421	[LAC 33:III.2122.C.1.d]	Pumps and valves in heavy liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 within 5 days if observed leaking by sight, sound, or smell. Repair according to LAC 33:III.2122.C.3 if the pump or valve is determined to be leaking in excess of the applicable limits given in LAC 33:III.2122.
422	[LAC 33:HI.2122.C.2]	Which Months: All Year Statistical Basis: None specified  Do not locate any valve, except safety pressure relief valves, at the end of a pipe or line containing volatile organic compounds unless the end of such line is sealed with a second valve, a blind flange, a plug, or a cap. Remove such sealing devices only when the line is in use, for example, when a sample is being taken. When the line has been used and is subsequently resealed, close the upstream valve first, followed by the sealing
		device.
423	[LAC 33;III.2122.C.3]	Make every reasonable effort to repair a leaking component, as described in LAC 33:III.2122, within 15 days, except as provided.
424	[LAC 33:1H.2122,C.4]	Determine the percent of leaking components at a process unit for a test period using the equation in LAC 33:III.2122.C.4.
425	[LAC 33:III.2122.C.5]	Determine the total percent of leaking and unrepairable components using the equation in LAC 33:III.2122.C.5.
426	[LAC 33:III.2122.D.1.a]	Process drains: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 annually (one time per year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
٠		Which Months: All Year Statistical Basis: None specified
427	[LAC 33:III.2122.D.1.b.i]	Compressor seals: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
		Which Months: All Year Statistical Basis: None specified
428	[LAC 33:III.2122.D.1.b.ii]	Pressure relief valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Which Months: All Year Statistical Basis: None specified
429	[LAC 33:III.2122.D.1.b.iii]	Valves in light liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may elect to comply with the alternate standards for valves in LAC 33:III.2122.E (skip period provisions).
430	[LAC 33:III.2122.D.1.b.iv]	Which Months: All Year Statistical Basis: None specified Pumps in light liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Which Months: All Year Statistical Basis: None specified
431	[LAC 33:III.2122.D.1.b.v]	Valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may elect to comply with the alternate standards for valves in LAC 33:III.2122.E (skip period provisions).
432	[LAC 33:HI.2122.D.1.c]	Which Months: All Year Statistical Basis: None specified Pumps: Seal or closure mechanism monitored by visual inspection/determination weekly (52 times a year). Which Months: All Year Statistical Basis: None specified

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## FUG 0004 F-6C - F-6C, CATHY FUGITIVE EMISSIONS

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433	[LAC 33:III.2122.D.1.d.i]	Flanged connectors: Presence of a leak monitored by visual, audible, and/or olfactory weekly.
		Which Months: All Year Statistical Basis: None specified
434	[LAC 33:III.2122.D.1.e]	Instrumentation systems: Presence of a leak monitored by visual, audible, and/or olfactory weekly.
		Which Months: All Year Statistical Basis: None specified
435	[LAC 33:III.2122.D.3.a]	Pressure relief valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 within 24 hours after venting to the atmosphere. If a
		reading of 1,000 ppmv or greater (for petroleum refineries, SOCMI, MTBE, and polymer manufacturing industry) or 2,500 ppmv or greater (for
		natural gas processing plants) is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
:		Which Months: All Year Statistical Basis: None specified
436	[LAC 33:III.2122.D.3.b]	All components: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 upon each occurrence of a leak detected by sight, smell, or
		sound, unless electing to implement actions as specified in LAC 33:III.2122.C.3.
		Which Months: All Year Statistical Basis: None specified
437	[LAC 33:III.2122.D.3.c]	Inaccessible valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 annually (at a minimum).
		Which Months: All Year Statistical Basis: None specified
438	[LAC 33:III.2122.D.3.d]	Unsafe-to-monitor valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 upon each occurrence of conditions allowing these
		valves to be monitored safely.
		Which Months: All Year Statistical Basis: None specified
439	[LAC 33:III.2122.F.1]	When a component which has a leak that cannot be repaired, as described in LAC 33:III.2122.C, is located, affix to the leaking component a
		weatherproof and readily visible tag bearing an identification number and the date the leak is located. Remove the tag after the leak has been
	•	repaired.
440	[LAC 33:III.2122.F]	Equipment/operational data recordkeeping by survey log upon each occurrence of a leak. Include the leaking component information specified
		in LAC 33:III.2122.F.2.a through j. Retain the survey log for two years after the latter date specified in LAC 33:III.2122.F.2 and make said log
:		available to DEQ upon request.
441	[LAC 33:III.2122.G]	Submit report: Due semiannually, by the 31st of January and July, to the Office of Environmental Assessment, Environmental Technology
	-	Division. Include the information specified in LAC 33:III.2122.G.1 through 6 for each calendar quarter during the reporting period.

#### FUG 0005 F-6D - F-6D, DAPHNE FUGITIVE EMISSIONS

442	[LAC 33:III.2111]	Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling
		conditions with mechanical seals or other equivalent equipment.
443	[LAC 33:III.2122]	LAC 33:III.2122 applies only if/when anisole is produced. Rhodia will implement a fugitive monitoring program per LAC 33:III.2122 prior to
		startup of anisole campaign,

# **GRP 0006** - Cathy

Group Members: EQT 0076EQT 0077EQT 0078EQT 0079EQT 0100EQT 0101EQT 0102EQT 0103EQT 0104EQT 0105EQT 0106EQT 0107EQT 0109EQT 0110EQT 0111EQT 01112EQT 0113EQT 0114
EQT 0115EQT 0116EQT 0137EQT 0139EQT 0239EQT 0240EQT 0241EQT 0242EQT 0243EQT 0244EQT 0245EQT 0247EQT 0248EQT 0249EQT 0250EQT 0251EQT 0252EQT 0253EQT 0254
EQT 0256FUG 0004EQT 0080EQT 0081EQT 0083EQT 0084EQT 0085EQT 0086EQT 0087EQT 0089EQT 0090EQT 0091EQT 0092EQT 0095EQT 0096EQT 0098

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#### GRP 0006 - Cathy

444 [LAC 33:III.2147,F]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

# GRP 0014 WWT - EMISSIONS CAP - WW TREATMENT PLANT

Group Members: EQT 0118EQT 0119EQT 0120EQT 0121EQT 0122EQT 0123EQT 0124

445 [LAC 33:III.2153.F.1]

Maintain records to demonstrate that the annual VOC loading in wastewater is less than or equal to 10 Mg (11.03 tons).

# GRP 0022 Fire Pump Diesel Engines - Fire Pump Diesel Engines

Group Members: EQT 0286EQT 0287		
446	[40 CFR 63.6595(a)(1)]	40 CFR 63 Subpart ZZZZ requirements become effective May 3, 2013. [40 CFR 63.6595(a)(1)]
447	[40 CFR 63.6603(a)]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
448	[40 CFR 63.6603(a)]	Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
449	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)] Which Months: All Year Statistical Basis: None specified
450	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
451	[40 CFR 63.6605(a)]	Which Months: All Year Statistical Basis: None specified  Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]
452	[40 CFR 63.6605(b)]	Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63,6605(b)]
453	[40 CFR 63.6625(e)]	Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
454	[40 CFR 63.6625(f)]	Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
455	[40 CFR 63.6640(a)]	Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR 63.6640(a)]
456	[40 CFR 63.6640(f)(1)ii]	Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]

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# GRP 0022 Fire Pump Diesel Engines - Fire Pump Diesel Engines

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457 [4	0 CFR 63.6640(f)(1)iii]	Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
458 [4	0 CFR 63.6655]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
459 [L	AC 33:III.1101.B]	Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
460 [L	AC 33:III.1311.C]	Which Months: All Year Statistical Basis: None specified  Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  Which Months: All Year Statistical Basis: Six-minute average

## UNF 0001 - Cathyval Plant

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461	[40 CFR 60.]	All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
462	[40 CFR 61.145(b)(1)]	Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies.
		Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. [40 CFR 61.145(b)(1)]
463	[40 CFR 61.148]	Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
404	[40 CICD C2 ]	- · · · · · · · · · · · · · · · · · · ·
464	[40 CFR 63.]	All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 8 of 40 CFR 63 Subpart ZZZZ.
465	[40 CFR 68.150]	Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
466	[40 CFR 68.155]	Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (f).
467	[40 CFR 68.160]	Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (20).
468	[40 CFR 68.165]	Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (14).
469	[40 CFR 68.168]	Submit in the RMP the information provided in 68.42(b) on each accident covered by 68.42(a).

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470	[40 CFR 68.175]	Provide in the RMP the information indicated in 68.175(b) through (p).
471	[40 CFR 68.180]	Provide in the RMP the emergency response information listed in 68.180(a) through (c).
472	[40 CFR 68.185(b)]	Submit in the RMP a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete. [40 CFR 68.185(b)]
473	[40 CFR 68.190(c)]	Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
474	[40 CFR 68.190]	Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
475	[40 CFR 68.200]	Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
476	[40 CFR 68.22]	Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
477	[40 CFR 68.25]	Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
478	[40 CFR 68.28]	Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one
479	[40 CFR 68.30]	alternative release scenario to represent all flammable substances held in covered processes, as specified in 68.28(b) through (e). Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
480	[40 CFR 68.33]	List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
481	[40 CFR 68.36(b)]	Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
482	[40 CFR 68.36]	Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
483	[40 CFR 68.39]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.
484	[40 CFR 68.42]	Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (11) for each accidental release.
485.	[40 CFR 68.65(d)(2)]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that equipment complies with recognized and
486	[40 CFR 68.65(d)(3)]	generally accepted good engineering practices. [40 CFR 68.65(d)(2)]  Determine that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, in designed, projected in accordance with codes, standards, or practices that are no longer in general use,
487	[40 CFR 68.65(d)(3)]	is designed, maintained, inspected, tested, and operating in a safe manner. [40 CFR 68.65(d)(3)]  Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner. [40 CFR 68.65(d)(3)]

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488	[40 CFR 68.67(e)]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Document the resolution of the recommendations of the team performing the process hazard analysis, and what actions are to be taken. [40 CFR 68.67(e)]
489	[40 CFR 82.Subpart F]	Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B.
490	[LAC 33:III.1103]	Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
491	[LAC 33:III.1109.B]	Outdoor burning of waste material or other combustible material is prohibited.
492	[LAC 33:III.1303.B]	Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
493	[LAC 33:III.1513]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III. Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.
494	[LAC 33:III.2113.A]	Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
495	[LAC 33:III.219]	Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
496	[LAC 33:III.2901.D]	Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
497	[LAC 33:III.2901.F]	If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
498	[LAC 33:III.501.C.1]	Submit permit application: Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33:III.Chapter 5. Submit a timely and complete permit application to the Office of Environmental Services, Permits Division as required in accordance with the procedures in LAC 33:III.Chapter 5.
499	[LAC 33:III.507.A.1.a]	Any major source as defined in LAC 33:III.502 is designated a Part 70 source and is required to obtain a permit which will meet the requirements of LAC 33:III.507.
500	[LAC 33:III.507.E.4]	Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
501	[LAC 33:III.509.I.1]	No major stationary source or major modification to which the requirements of this Part apply shall begin actual construction without a permit issued under this Section.
502	[LAC 33:111.509.J.1]	A major stationary source or major modification shall meet each applicable emissions limitation under the Louisiana State Implementation Plan and each applicable emissions standard and standard of performance under the Louisiana New Source Performance Standards (LNSPS) and Louisiana Emission Standards for Hazardous Air Pollutants (LESHAP) and Sections 111 and 112 of the Clean Air Act.

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503	[LAC 33:III.509.J.3]	A major modification shall apply best available control technology for each pollutant subject to regulation under this Section which would result in a significant net emissions increase at the source. This requirement applies to each proposed emissions unit at which a net emissions increase
504	[LAC 33:III.509.J.4]	in the pollutant would occur as a result of a physical change or change in the method of operation in the unit.  For phased construction projects, the determination of best available control technology shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than 18 months prior to commencement of construction of each independent phase of the project. At such time, the owner or operator of the applicable stationary source may be required to demonstrate the adequacy of any previous determination of best available control technology for the source.
505	[LAC 33:III.5105.A.1]	Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III Chapter 51 Subchapter A without first obtaining
506	[LAC 33:III.5105.A.2]	written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.  Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.
507	[LAC 33:III.5105.A.3]	Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
508	[LAC 33:III.5105.A.4]	Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
509	[LAC 33:HI.5107.A.2]	Submit Annual Emissions Report (TEDI): Due annually, by the 1st of July, to the Office of Environmental Assessment, Environmental Evaluation Division in a form specified by the department. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
510	[LAC 33:III.5107.A.3]	Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33-III 502
		Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations"
511	[LAC 33:III.5107.B.1]	Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an
		emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
512	[LAC 33:III.5107.B.2]	Submit notification: Due to the Office of Environmental Compliance, except as provided in LAC 33:III.5107 B 6, no later than 24 hours after
		the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the
		Minimum Emission Rate (MER) in LAC 33:III.Chapter 51.Table 51.1 or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner
513	[LAC 33:III.5107.B.3]	provided in LAC 33:1.3923.  Submit notification: Due to the Office of Environmental Compliance immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit compliance schedule or permit compliance schedule or permit compliance schedule.

provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:I.3923.

allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931, except as

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514	[LAC 33:III.5107.B.4]	Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in
515	[LAC 33:III.5107.B.5]	LAC 33:III.5107.B.4.a.i through viii.  Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity
516	[LAC 33:III.5109.B.3]	of the source, the date and time of the discharge, and the approximate total loss during the discharge.  Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that in Maximum Achieved 11. Could be supported to pose a threat to public health or the environment;
517	[LAC 33:III.5109.B]	and that emissions would be controlled to a level that is Maximum Achievable Control Technology.  Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112. Table 51.2 for any toxic air pollutant that is emitted or permitted to be emitted at a rate equal to or greater than the minimum emission rate listed for that toxic air pollutant in LAC 33:III.5112. Table 51.1.
518	[LAC 33:III.5109.C]	Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC
		33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department.
519	[LAC 33:III.5111.A.2.a]	Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D, if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source.
520	[LAC 33:III.5111.A]	Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified.
521	[LAC 33:III.5113.B.1]	Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel.
522	[LAC 33:III.5113.B.2]	Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
523	[LAC 33:III.5113.B.3]	Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants, upon request of the department.
524	[LAC 33:III.5113.B.4]	Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through e.
525	[LAC 33:III.5113.B.5]	Submit certified letter: Due to the Office of Environmental Assessment, Environmental Technology Division before the close of business on the 45th day following the completion of the emission test. Report the determinations of the emission test.
526	[LAC 33:III.5113.B.5]	Analyze samples and determine emissions within 30 days after each emission test has been completed.
527	[LAC 33:III.5113.B.6]	Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.

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Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

UNF	0001 - Cathyval Plant	
528.	[LAC 33:III.5113.B.7]	Submit notification: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
529	[LAC 33:III.5113.C.1]	Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
530	[LAC 33:HII.5113.C.2]	Submit notification in writing: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before a performance evaluation of the monitoring system is to begin.
531	[LAC 33:III.5113.C.3]	Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems.
532	[LAC 33:III.5113.C.5.a]	Submit report: Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days.
533	[LAC 33:III.5113.C.5.d]	Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS.
534	[LAC 33:111.5113.C.5.e]	Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii, if required to install a CMS.
535	[LAC 33:III.5113.C.5]	Submit plan: Due to the Office of Environmental Assessment, Environmental Technology Division within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system.
536	[LAC 33:HI.5113.C.7]	Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
537	[LAC 33:III.511]	Submit notification: Due to the permitting authority prior to the initiation of any project which will result in emission reductions. Include in the notification a description of the proposed action, a location map, a description of the composition of air contaminants involved, the rate and temperature of the emissions, the identity of the sources involved and the change in emissions. Make any appropriate permit revision reflecting the emission reduction no later than 180 days after commencement of operation and in accordance with the procedures of LAC 33:III. Chapter 5.
538	[LAC 33:III.5151.F.1.f]	An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
539	[LAC 33:III.517.A.1]	Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III.Chapter 5 prior to approval by the permitting authority.
540	[LAC 33:III.517.A.2]	Submit permit application: Due by the date established for submittal in accordance with LAC 33:III.507.C. The permit application is for an initial permit to be issued in accordance with LAC 33:III.507. Provide a copy of each permit application pertaining to a major Part 70 source to

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EPA at the time of application submittal to the permitting authority.

Al ID: 1314 - Rhodia Inc Activity Number: PER20100003 Permit Number: 2184-V2 Air - Title V Regular Permit Renewal

UNF	0001 - Cathyval Plant	
541	[LAC 33:III.517.D]	Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted
542	[LAC 33:III.5609.A.1.b]	The state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the s
543		Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert.  Activate the preplanned abatement strategy listed in LAC 33:III.5611 Table 7 when the administrative authority declares an Air Pollution  Emergency
544	[LAC 33:III.5609.A]	Billot Bolloy.
	-	Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.  Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7.
545	[LAC 33:III.5611.A]	and the reduction of children of children of children of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the contr
546	[LAC 33:III.5611.B]	Bondy. Dub within Do days after requested by the summerrative sufficients.
547	[LAC 33:III.5901.A]	During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
		Comply with the provisions in 40 CFR 68, except as specified in LAC 33-HI 5901
548	[LAC 33:III.5907]	Identify hazards that may result from accidental releases of the substances listed in 40 CVD 68 120 Table 50 0 CV 4 C 20 VX 50 CV
		59.10f LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
549	[LAC 33:III.5911.A]	Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33-III Charter 50 and in 1998.
		and the middle in the DAC 55:111.5911.B, and submit to the Department of Environmental Quality, Office of Environmental
550	[LAC 33:III.5911.C]	compliance, but vernance Division,
	•	Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Surveillance Division within 60 days after the information in the submitted registration is no longer accurate.
551	[LAC 33:III.905]	Install air pollution control facilities whenever practically economically and technologically facilities whenever practically economically and technologically facilities whenever practically
		property, take them and diagenty maintain them in proper working order whenever any emissions are being ready which can be a several 11.11
552	[LAC 33:III.913]	facilities, even though the ambient air quality standards in affected areas are not exceeded.  Provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determined.
552	[[ A C 22.]]] 017 A1	defining devices as may be necessary for proper determination of emission limits
553	[LAC 33:III.917.A]	Where, upon written application of the responsible person or persons, the administrative authority finds that have a second of the responsible person or persons, the administrative authority finds that have a second of the responsible person or persons.
		circumstances strict conformity with any provisions of these regulations would cause undue hardship, would be unreasonable, impractical or not feasible under the circumstances, the administrative authority may permit a variance from these regulations.
	[LAC 33:III.917.B]	No variance may permit or authorize the maintenance of a nuisance, or a danger to public health or safety.
555	[LAC 33:III.919.D]	Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually by the 31st of March for the period Japanese 1 to December 21.
		the previous year. Submit emission inventory data in the format specified by the Office of Environmental Assessment Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmental Environmenta
556	[LAC 33:III.927]	Division. Include an data applicable to the emissions source(s), as specified in LAC 33-III 010 A-D
	-	Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and
		appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.

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Al ID: 1314 - Rhodia Inc

Activity Number: PER20100003

Permit Number: 2184-V2

Air - Title V Regular Permit Renewal

## UNF 0001 - Cathyval Plant

557 [LAC 33:III.929.A]

No person or group of persons shall allow particulate matter or gases to become airborne in amounts which cause the ambient air quality standards to be exceeded.



September 23, 2010

Ms. Cheryl Nolan, Assistant Secretary (**Hand Delivered**, 3 copies) LA Department of Environmental Quality Office of Environmental Services P. O. Box 4313 Baton Rouge, LA 70821-4313 AIR PLAMMING SEC.

Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency, Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Subject:

Application for Permit Modification - Sulfuric Acid Plant

Rhodia, Inc., Baton Rouge, LA Title V Permit No. 0840-0033-V2 Agency Interest No. 1314

Dear Ms. Nolan:

On November 30, 2009, LDEQ issued a Title V Permit Renewal to Rhodia for the Sulfuric Acid Plant. Rhodia is requesting a permit modification to include a federally enforceable annual capacity factor limitation for the Rental (Holman) boiler. The application also addresses minor revisions to applicable requirements and emission reconciliation issues.

If you have any questions or require any further information, please call John Richardson at 359-3768 or Julie Sheffield at 359-3432.

Sincerely,

John Richardson

Environmental Manager

File 402.1.2

reffield for



# APPLICATION TO MODIFY ACID PLANT TITLE V AIR PERMIT

AI 1314

SEPTEMBER 2010

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# **Figures**

1 Site Location Map

i

# SECTION 1.0 INTRODUCTION

## 1.0 INTRODUCTION

#### 1.1 Background

Rhodia, Inc. operates a sulfuric acid plant in Baton Rouge, East Baton Rouge Parish. The plant currently operates under Title V Permit No. 0840-00033-V2. Operating rates and process descriptions are unchanged from the current permit, except for the boiler issues discussed below.

The plant has two natural-gas fired boilers for backup steam supply. In March 2010, the Package (ABCO) Boiler had a serious malfunction and has been undergoing offsite repair/rebuild. Although a detailed reconstruction cost analysis has not been performed, Rhodia assumes that this project is "reconstruction" per NSPS Db. Note that the ABCO boiler was already subject to NSPS Db.

The ABCO boiler will return onsite in September. Rhodia has scheduled J&M Boiler to tune the boiler after startup and Weston Solutions, Inc. to stack test for NOx and CO. Emissions data will be collected over the full operating range of the boiler to either confirm or update the existing parametric NOx Monitoring Plan per §60.48b(g)(2). However, Rhodia plans to install a NOx analyzer on the ABCO boiler per §60.48b(b)(1) to replace the existing parametric Monitoring Plan. Rhodia will continue to use the NOx Monitoring plan until the NOx analyzer is installed and certified in the first or second quarter of 2011.

Assuming that reconstruction of an NSPS Db boiler requires a new 30-day performance test per §60.46b(e)(1), Rhodia requests approval from LDEQ to delay the test until after the NOx analyzer is installed and certified. Note that §60.8(b)(4) allows LDEQ to waive the performance test requirement if LDEQ is satisfied that the source has demonstrated compliance with the standard by other means. Rhodia is proposing to delay the 30-day performance test, not waive it, and will also conduct the shorter-term NOx testing discussed above upon boiler re-startup to demonstrate compliance in the interim before the NOx analyzer is online.

Because the Rental (Holman) Boiler has been the sole backup steam supply since the ABCO malfunction, it has operated at >10% annual capacity factor for 2010 as discussed in a letter to LDEQ on March 23, 2010. Note that the maximum heat input capacity was demonstrated to be 124 MMBTU/hr in February 2010 which supersedes the December 2006 demonstration at 104 MMBTU/hr (manufacturer's rating is 133 MMBTU/hr).

015-010-001er 1-1

# 1.2 Requested Modifications

- Reinstate the 10% annual capacity limit per 40 CFR 60.44b(j)(3) on the Rental (Holman) Boiler (EIQ 1-06, EQT 0186), effective January 1, 2011. The permit should no longer reference 104 MMBTU/hr as the maximum heat input capacity (see permit briefing sheet). Rhodia requests that the permit not specify the maximum heat input capacity numerically. Instead, the boiler should be "limited to 10% annual capacity factor as defined in §60.41b based upon maximum heat input capacity as defined in §60.46b(g)."
- Modify the applicable NSPS Subpart Db requirements for the Package (ABCO) Boiler (EIQ 6-90, EQT 0153) to address the NO<sub>x</sub> analyzer. These requirements should become effective upon installation of the NO<sub>x</sub> analyzer in the first half of 2011.
- Request that LDEQ grant an extension to the 30-day NOx performance test required by 60.46b(e) until the NOx analyzer is installed and certified.
- Revise the maximum lbs/hr limit for NO<sub>x</sub> on the Package (ABCO)
   Boiler to allow for normal variation in short-term emissions.
- Reconcile emissions of PM10 from the cooling towers using a better estimate of total dissolved solids (TDS). Please see the letter from Rhodia to LDEQ on October 13, 2009 for more information.
- Reconcile emissions from the gasoline tank (EIQ 28, EQT 0152) using updated input parameters in the TANKS 4.09 program.
- Create an EIQ form for the Diesel Fire Water Pump 20G961 (EIQ M10). This pump will be subject to 40 CFR Part 63 Subpart ZZZZ.
- Request clarifications to the GCXVII Activities table and List of Insignificant Activities.
- Replace the specific requirement for weekly pump inspections in the Treatments Services area with the appropriate requirement for dualmechanical seal pumps.
- Submit a revised EIQ form for Treatment Services Sumps. The revised EIQ updates UTM coordinates only.

1-2

015-010-001er

#### 1.3 Future Permit Actions

Voluntary stack testing conducted in September 2009 on two vapor combustors (Treatment Services Vapor Combustor EIQ 21, EQT 0147; Acid Plant Vapor Combustor, EIQ 27, EQT 0151) indicated some emission rates in excess of permitted maximum hourly rates (see the November 30, 2009 letter from Rhodia to LDEQ). These vapor combustors are both backup control devices. Efforts are well underway to reduce emissions where possible (i.e., decreased utilization of backup devices, combustor tuning, TSVC internals and stack will be replaced in the fourth quarter of 2010). However, permit limits for some pollutants may ultimately need to be reconciled to better reflect actual operation. This will be addressed in a future permit action(s) because the troubleshooting, testing, and equipment modifications are not yet complete.

015-010-001er

1-3

# SECTION 2.0 APPLICATION FOR APPROVAL OF EMISSIONS

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

# **LOUISIANA**

# Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

1. Facility Information [LAC 33:III.51	7.D.1]	ORTIGIT				
Facility Name (if any)				O All Pr	ocess Units	
Sulfuric Acid Plant				Proces	ss Unit-Spe	cific Permit
Agency Interest Number (A.I. Number)			Currently	Effective Po	ermit Numl	ber(s)
1314				0840-0003	3-V2	
Company - Name of Owner						
Rhodia, Inc.						
Company - Name of Operator (if different from	m Owner)					
N/A						
Parent Company (if Company – Name of Own N/A	ier given above is a	division)				
Ownership: Check the appropriate box.						
corporation, partnership, or sole proprietorship	O regulate	d utility	0	municipal gove	rnment	· · · · · · · · · · · · · · · · · · ·
O state government	O federal s	government	0	other, specify		
What does this facility produce? Add more rows of Sulfuric Acid  What modifications/changes are proposed in this Please see attached introduction	•	ore rows as ne	cessary.			
Nearest town (in the same parish as the	facility):	]	Parish(es)	where facility	is located:	
				· · · · · · · · · · · · · · · · · · ·		
Distance To (mi): ~222 Texas	~269	Arkansas	~129	Mississippi	~262	Alabama
Latitude Front Gate: 30 Deg		Min		Sec	30	Hundredths
Longitude Front Gate: -91 Deg Distance from nearest Class I Area 225		Min	16	Sec	58	_Hundredths
Add physical address and description of location		low. If the fac	ility has n	o address, pi	rovide drivi	ng directions.
Add more rows as necessary.						
1275 Airline Highway, Baton Rouge, LA 708 of the Mississippi River.	05. Rhodia is loca	ted immediate	ly north o	f Highway 1	90 along ti	he east bank
■ Map attached (required per LAC 33:III.517	7 D 1)					
Description of processes and products attac	·	AC 33·III 517 I	D 2) <i>NOT</i>	E: no chanoe	from curre	nt nermit
Introduction/Description of the proposed pr	` • •		•	•	<i>J.</i> 5 6	,, p. 0, 1, 10, 1
indoduction Description of the proposed pr	roject attached (requ	illed per LAC :	,J.III.J 1 7.J	J.J)		
3. Confidentiality [LAC 33.I.Chapter 5						
Are you requesting confidentiality for any inform					O Yes	● No
If "yes," list the sections for which confidential				-		-
submittal that is separate from this application.	Information for whi	cn confidential	ity is requ	ested should i	not be subm	utted with this

application. Consult instructions.

4. Type of Application [LAC 33:III.517.D]	4.	<b>Type</b>	of Ap	plication	[LAC	33:	III.	.517.D
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Complete appropriate		column (1 or	r 2) that correspond	ls to the ty	pe of pe	ermit being s	ought. Check	all that app	oly with	nin the
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☐ Rene	ewal				Renev					
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1 1 1	nciliations)	sion of existing	racinty (may also mer		also ir	nclude reconcil	liations) [LAC 3	33:III. <b>5</b> 27]		
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☐ Indiv	ridual emissions u	nit(s) addition			Recon	ciliation only				
				NS	R Analysi	s:				
				[	PSD	☐ NNSR	<b>t</b>			
Does this s	ubmittal update	or replace an	application current	ly under re	view?			O Yes	•	No
If yes, prov	ide date that the	prior applica	tion was submitted:				N/A			
Select one	if this applicatio	n is for an exi	sting facility that do	es not have	an air q	uality permit:	:			
☐ Prev	iously Grandfatl	hered (LAC 3	3:ІП.501.В.6)							
☐ Prev	iously Exempted	d (e.g., Small	Source Exemption;	Act 918)						
☐ Prev	iously Unpermit	ted								
Fee Param		code is based	.517.D.17] on an operational pater that parameter he	•	ich as		Per ton daily	rate capacit	y	
			d Industrial Classific		) Codes t	hat apply to t	he facility.			
Primary S		2819			,					
Secondary	SICC(s):	N/A								
	oter 2. Add row	s to this table	code, permit type, as needed. Include	-	_		t in the Grand	_	as the	permit
FEE CODE	TYPE	CAPACITY	INCREASE	MULTII	PLIER	NSPS	PSD	TOXICS	TO1	
0540	minor								\$ 1,5	
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			ing the permit applie							
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6. Key Dates  Estimated date construction will comm	nence:		NA	
Estimated date operation will commer			NA	
7. Pending Permit Application List all other process units at this facil LDEQ as of the date of submittal of during the permit review process, unle	ity for which Par this application.	t 70 permit applications have If none, state "none" in the	been submitted, but ha	we not been acted upon by
Process Unit Name		Permit Number	Date	Submitted
CATHYVAL		2184-V1	Febru	ary 15, 2010
8. LAC 33:I.1701 Requirement	ıts – Answer	all below for new sourc	es and permit rene	ewals
Does the company or owner have fe nature to, the permit for which you at to all individuals, partnerships, corpo more in your company, or who partic applying for the permit or an ownersh	re applying in Lo orations, or othe ipate in the envi	ouisiana or other states? (Thi r entities who own a controlli ironmental management of th	s requirement applies ng interest of 50% or	● Yes ○ No
If yes, list States:		Indiana, Califorr	ia, Texas	
Do you owe any outstanding fees or fi If yes, explain below. Add rows if nec		he Department?		O Yes   No
Is your company a corporation or limit If yes, attach a copy of your company from the Secretary of State. The application as an appendix.	y's Certificate o	f Registration and/or Certific		● Yes O No
9. Permit Shield Request [LA If yes, check the appropriate boxes to regulatory citation(s) for which the state will justify the permit shield request, attach them directly behind this properties of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of Permit Shield request (check the state of	indicate the type hield is being re uest. Attach add page and enter "	of permit shield being sough quested. Give an explanation itional pages if necessary. If	of the circumstances additional pages are	O Yes   Note: no new permit shields being requested.
Type of Permit Shield request (check : Non-applicability determin		Specific Citation(s)	Ex	planation
☐ 40 CFR 60				1
☐ 41 CFR 61				
☐ 42 CFR 63				
□ PSD				
□ NNSR				
Interpretation of monitoring/recordkee and/or means of complian				
☐ 40 CFR 60			<u></u>	
☐ 41 CFR 61				
☐ 42 CFR 63				
□ PSD				
☐ NNSR				

State Implementation Plan (SIP)

#### 10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application.

For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

United States law which provistatements, that based on infor	ide criminal	penalties for fal	se drawing	s, and design are true		
reasonable inquiry, the statemen	ts and inform	nation contained	in			
this Application for Approval of Part 70 Sources, including al						
compliance statement above, are t			ie			
a. Responsible Official			b. Prof	essional Engineer		
Name			Name			
Daniel Tate				Julie Baron Shef	field	
Title	-		Title			
Plant Manager				Environmental C	onsultant	
Company	-		Compan	У		
Rhodia, Inc.				JBS, L.L.C.		
Suite, mail drop, or division			Suite, m	ail drop, or division		
Street or P.O. Box			Street or	P.O. Box		
PO Box 828				PO Box 828		
City	State	Zip	City		State	Zip
Baton Rouge	LA	70821		Baton Rouge	LA	70821
Business phone			Business	phone		
(225) 359-3751				(225) 359-3432		
Email Address			Email A	ddress		
<u> Daniel.Tate@ US.RI</u>	HODIA.com			Julie.Sheffield@L	JS.RHODIA.co	<u>om</u>
Signature of responsible official (	See 40 CFR 70	0.2)	Signatur	e of Professional Engin	eer	
Date 5/16/2010			(	JBaron S 9-15-10	heffeld	L
Date			Date	V	<del></del>	
8/16/2010				9-15-10	•	
, , , , , , , , , , , , , , , , , , , ,			Louisian	a Registration No.	2	24677

JULIE A. BARON REG. No. 24677
REGISTERED Professional Engineer
IN

CAL ENGINEERING

11. Personnel [LAC 33:III.517.D.1] a. Manager of Facility who is located at plant site b. On-site contact regarding air pollution control Name **Primary Contact Primary Contact** Name John Richardson **Daniel Tate** Title Title **Environmental Manager** Plant Manager Company Company Rhodia, inc. Rhodia, Inc. Suite, mail drop, or division Suite, mail drop, or division Street or P.O. Box Street or P.O. Box PO Box 828 PO Box 828 State Zip State Zip City City 70821 LA 70821 **Baton Rouge** LA **Baton Rouge** Business phone Business phone (225) 359-3751 (225) 359-3768 Email Address Email Address John.Richardson@US.RHODIA.com Daniel.Tate@ US.RHODIA.com c. Person to contact with written correspondence d. Person who prepared this report O Primary Contact Name **Primary Contact** Name John Richardson Title Title **Environmental Manager** Company Company Rhodia, Inc. Suite, mail drop, or division Suite, mail drop, or division Street or P.O. Box Street or P.O. Box PO Box 828 Zip State Zip City State City LA 70821 **Baton Rouge** Business phone Business phone (225) 359-3768 Email Address Email Address John.Richardson@US.RHODIA.com

	See "b"	
Street or P.O. Box		
City	State	Zip
Business phone		
Email Address		
	City Business phone	Street or P.O. Box  City State  Business phone

## 12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
Listed below are the only pollutants being modifed, and the proposed permit modification. All other pollutants ('brevity, are not listed below.	
PM <sub>10</sub>	135.46
SO <sub>2</sub>	phase I: 12449.45
SO₂	phase II: 4726.08
SO <sub>2</sub>	phase III: 1077.89
NOx	117.13
СО	95.76
VOC Total	26.53

## 13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.
- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
0840-00033-V2	November 30, 2009

# 14. Facility-wide Permitted Emissions - For Process Unit-Specific Permits Only [LAC 33:III.517.D.3]

List each of the following:

• All currently effective air quality permits for this facility. All process units located at this facility should be represented in this section. This includes any Acid Rain or PSD permits.

For each listed currently effective air quality permit:

• Show each permitting action's grand total for each permitted pollutant. These rates should be those shown in the permitting action as issued by LDEQ and not those shown in the application for the permitting action. For administrative amendments, it is only necessary to state the emission rates that were amended.

Group the permitted emission rates by permit action. Consult instructions.

Permit Actions	tv-wide grand total for each pollutan  Date Action Issued	Pollutant	Permitted Emission Rate (tons/yr)
	ollutants being modifed, and the All other pollutants (TAPs) will		
2184-V1	September 4, 2007	PM <sub>10</sub>	7.74
		SO <sub>2</sub>	0.03
		NO <sub>X</sub>	4.41
		СО	3.70
		VOC total	25.02
0840-00033-V2	November 30, 2009	PM <sub>10</sub>	54.52
		SO <sub>2</sub> - Phase III	1077.79

	NO <sub>X</sub>	115.58
	СО	95.43
	VOC total	26.16
Facility Total	PM <sub>10</sub>	62.26
	SO <sub>2</sub> - Phase III	1077.82
	NO <sub>X</sub>	119.99
	со	99.13
	VOC total	51.18

15.a. Enforcement Actions [LAC 33:HI.517.D.18]

13.a. Enforcement Actions	[LAC 33.III.317.D.10]		
, ,		s, settlement agreements, and consent init-specific permits) since the issuance	
type of action (or its tracking num the date that the action was iss	iber), the regulatory authority or ued. Summarize the conditions t decree in Section 23, Table 2.	ating Permit. For each action, list the authorities that issued the action, and imposed by the enforcement action, It is not necessary to submit a copy of	No such actions since issuance of current
Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?
			O Yes • No

15.b. Schedule	for Complia	ance [	LAC	33:III.517.E.4]								
If the facility or p	rocess unit fo	r whic	h appli	ication is being me	ade is not in	full c	compliance w	ith all	0	Yes		No
applicable regulati	ons, give a de	scriptio	on of h	ow compliance will	be achieved	, inclu	ding a sched	ule for	U	100		140
compliance below.	Add rows as n	iecessai	ry. See	instructions.								
								•				
16. Letters of A	Approval fo	r Alte	rnate	Methods of Co	mpliance							
If yes, list all corres						provid	es for or supp	ports a	0	Yes		No
request for alternat	e methods of	compli	ance w	ith any applicable	regulations j	or this	facility or p	rocess	U	163		140
unit (for process									No sı	uch do	cume	ents
referenced by the le	etter. Attach a	as an ap	opendix	c a copy of all docu	ments refere	nced ii	n this table.			issuar		
that are not include	d may not be i	ncorpo	rated ir	nto a final permit. A	idd rows to to	able as	necessary.	1		nt pern		
Date Letter	Issued		Issuir	ng Authority	Refer	enced	Regulation(s)	)	Сору	of Lett	er Att	tached'
									0	Yes	•	No
									0	Yes	•	No
17. Initial Notif	fications an	d Per	forma	nce Tests [LAC	33:III.51	7.E.1		l.				
If yes, list any initia	l notifications	that h	ave bee	en submitted or one	-time perforn	nance	tests that hav	e been	•	Yes	0	No
performed for this	facility or pro	ocess u	mit (for	r process unit-spec	ific permits)	since	the issuance	of the		. 00	_	
currently effective	_	_										
requirements. Any	_				_							
satisfied should be l					-							
that recur periodica	-	o be pr	operly	noted in Section 23,	, Table 2 of t	his app	olication. Ad	d rows				
to table as necessar	<u>y.</u> ification or					1						
		,	R	egulatory Citation S	Satisfied		Date (	Complete	leted/Approved			
One-time Perf Initial 30-Day NOx F												
Rental (Holman) B							<b></b>			. 7/00/	40	
operate at >10% an			40	) CFR 60.8 and 60	J.46b(e)		Submitte	ed test i	repor	t //29/	10	
	EQT0186											
Update of Maximum	•											
Test for Rental (Ho		EIQ 1-	40	) CFR 60.8 and 60	).46b(g)		Submit	ted test	repo	rt 9/3/1	0	
06, EC	T0186					<u> </u>						
18. Existing Pr	evention of	f Sign	ifican	t Deterioration	or Nonati	tainm	ent New S	ource	Rev	iew L	imit	ations
[LAC 33:III.517												
Do one or more em		_							0	Yes	•	No
more NSR permits?									_		_	
rows to table as no			note (	any annual emissio	ns limitation	is fron	ı such permi	t(s) in				
Sections 13 and 14 o	of this applica	tion.										
Th. 1:57			DD 7		BACT/LA	AER	Averaging	i	-	tion of		
Permit No.	Date Issued	l El	PN	Pollutant	Limit <sup>1</sup>		Period	Tech	_	gy/Worl		ctice
		<u> </u>							S	tandard	. <u>s</u>	
	F 75	~		J. 95 M								

<sup>&</sup>lt;sup>1</sup>For example, lb/MM Btu, ppmvd @ 15% O2, lb/ton, lb/hr

19. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

13. 12. 6 mm.) = 1. h 1. mm.					
Was Air Quality Dispersion Modeling as required by LAC 33:III performed in supplapplication? (Air Quality Dispersion Modeling is only required when applying for PS requested by LDEQ.)	0	Yes	•	No	
Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for				Ο	No
this facility in support of a air permit application previously submitted for this facility or process unit (for				_	
process unit-specific permits) or as required by other regulations AND approved by LDEQ?					
process unit-specific permits) or as required by other regulations AND approved by LDEQ:					
If yes, enter the date the most recent Air Quality Dispersion Modeling results as		2000			
required by LAC 33:III were submitted:					
required by LAC 33.111 were submitted.					

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	TAP AAS or NAAQS
H₂SO₄	8-hour	17.55 µg/m <sup>3</sup> (2002)	23.8 μg/m <sup>3</sup>
H <sub>2</sub> SO <sub>4</sub>	8-hour	18.19 µg/m <sup>3</sup> (2003)	23.8 μg/m <sup>3</sup>
H₂SO₄	8-hour	22.32 µg/m³ (2004)	23.8 μg/m <sup>3</sup>
H <sub>2</sub> SO <sub>4</sub>	8-hour	18.06 µg/m³ (2005)	23.8 μg/m <sup>3</sup>
H <sub>2</sub> SO <sub>4</sub>	8-hour	18.60 µg/m³ (2006)	23.8 μg/m <sup>3</sup>

# 20. General Condition XVII Activities

Enter	all activities that qualify as	Louisiana Air Emissions Pe	rmit Genera	l Condition $X$	VII Activitie	s.		
4 .	pand this table as necessary						<ul><li>Yes</li></ul>	O No
	e instructions to determine w						- 100	0 110
1	not include emissions from	ı General Condition XVII A	ctivities in th	he proposed o	emissions to	tals for		
the pe	rmit application.							
ID	Work Activity	Schedule			Emission Ra	tes – TP		
No.	WOIK Activity	Schedale	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>X</sub>	co	VOC	Other
Note	Edits from current GC	XVII List shaded gray.						
GC 1	Catalyst reconditioned in Sulfurinc Acid Unit Nos. 1 & 2	Once each 24 months per unit	0.2					
GC 2	Drum re-packaging	4 times per year					0.002	
GC 3	Vacuum trucks used for tank cleanouts, spill cleanup , and sump clean out	Weekly					0.06	
GC 4	Tank and process equipment cleaning						0.90	
GC 5	Opening of trucks and railcars containing waste fuel and spent acid for sampling, inspection, maintenance, or further processing	Daily					0.02	
GC 6	Sampling waste fuel trucks, railcars, and tanks via sample tap	10 times per day					0.01	##
GC 7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day					0.004	

GC 8	Washing inside surface of Unit 1 & 2 exhaust stacks	4 each Unit/Yr		1.33		0.03*
GC 9	Odor-neutralizing compounds				0.06	
GC 10	Manual gauging of tank levels				0.002	
GC 11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (former EIQ ID 18)		<0.001			<0.001#
GC 12	Sampling for moisture content, stack gauging, and pressure readings from gas streams		<0.1			<0.1*
GC 13	Loading fresh acid onto heel of spent acid		0.003		0.004	
GC 14	Acid Plant Vapor Combustor (APVC) routine maintenance	96 hours per year (max)			3.25	**
GC 15	Unloading containers of spent acid with small percentage of chlorinated VOCs	1 per week	0.50		0.06	**

<sup>\*</sup> Sulfuric Acid Mist

<sup>#</sup> Hydrogen Sulfide

\*\* Speciated VOCs covered by Spent Acid Process permitted emissions

## Speciated VOCs covered by TS Process permitted emissions

21. Insigni	ificant Activities [LAC 33:III.501.B.5]					
Enter all activ	vities that qualify as Insignificant Activities.					
• Expand th	nis table as necessary to include all such activitie	es.				
	rces claimed to be insignificant based on siz		B.5.A),			
information n						
1 -	heat input ratings.					
1	ate emissions from all similar pieces of equipme	ent (i.e. all LAC 33:III.501.B.5.A.1 act	ivities)			
	e insignificant are greater than 5 tons per year					
	s insignificant and must be represented as permi					
De ciumeu us	i insignificani una masi ve representea as permi	nea chission sources. Consun man uoi				
EPN	Description	Physical/Operating Data	Citation			
	stic Tanks containing no VOCs have beer from current IA list are shaded gray.	n deleted per LAC 33:III.501.B Iter	n B.40.			
20D962	Diesel Storage Tank, Firewater Pump	300 gals	LAC 33: III.501.B5.A.3			
90D360	Diesel Storage Tank, Maintenance	1000 gals	LAC 33: III.501.B5.A.3			
None	Diesel Storage Tank, IFS 1000 gals LAC 33: III.501.B5.A.3					
91D321	IFS Wash-water Storage Tank	9000 gals	LAC 33: III.501.B5.A.3			
90D210	Laboratory Excess Sample Tank	100 gals	LAC 33: III.501 B5:A.2			
Hoods	Different Analyses*	N/A	LAC 33: III.501.B5.A.6			

N/A 55 gals

LAC 33: III,501 B5.A.7

22. Regulatory Applicability for Commonly Applicable Regulations [LAC 33:III.517.D.10]

Different Analyses\*

**Drum Washing Operations** 

Does this facility contain asbestos or asbestos containing materials?  If "yes," the facility or any portion thereof may be subject to 40 CFR 61, Subpart M, LAC 33:III.Chapter 27, and/or LAC 33:III.5151 and this application must address compliance as stated in Section 23 of this application.				No
Is the facility or process unit represented in this permit subject to 40 CFR 68, or is any other process unit located at the same facility as the process unit represented in this application subject to 40 CFR 68? If "yes," the entire facility is subject to 40 CFR 68 and LAC 33:III.Chapter 59 and this application must address compliance as stated in Section 23 of this application.	•	Yes	0	No
Is the facility listed in LAC 33:III.5611	-			
Table 5	•	Yes	0	No
Table 6	•	Yes	0	No
Table 7	•	Yes	0	No
Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at this facility or process unit?  If "yes," the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of this application.	•	Yes	0	No

Hoods

<sup>\*</sup> Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environemental monitoring purposes.

# 23. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping Important points for Table 1 [LAC 33:III.517.D.10]:

• List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.

• Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.

- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC
- Consult instructions.

Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been
- Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be
- Consult instructions.

Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into
- Consult Instructions.

Important points for Table 4 [LAC 33:III.517.D.18]

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise
- Consult instructions.

#### 24. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:HI.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
  - 1. Sources that combust multiple fuels
- 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or
- 1. Equipment leaks.
- 2. Non-equipment leaks (i.e. road dust, settling ponds, etc).

#### For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form. http://www.deq.louisiana.gov/portal/LinkClick.aspx?link=permits%2fair%2f6-6-07 EIQ.xls&tabid=2758

N/A

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC

25.A. Project Summary

		A	В	С	D	Е	F
EPN	Description	New, Modified, Affected, or	Pre-Project Allowables	Baseline Actual Emissions	Projected Actuals	Post-Project PTE	Change
		Unaffected*	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)
PM <sub>10</sub>	24-Month Period.						
						PM <sub>10</sub> Change:	0

<sup>\*</sup>Unaffected emissions units are not required to be listed individually. By choosing not to list unaffected emissions units, the applicant asserts that all emissions units not listed in Table 24.A will not be modified or experience an increase in actual annual emissions as part of the proposed project.

25.B. Creditable Contemporaneous Changes

Contemporaneous Period:

		A	В	С	D	Е	F
		D. CM. P.C.	Pre-Project	Baseline Actual	24-Month	Post-Project	Change
EPN	Description	Date of Modification	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)
PM <sub>10</sub>							

25.C. BACT/LAER Summary

	25.C. DI	C I/LIZER N	, want in the J			
	For each sou	rce identified a	s "New" or "	Modified" in Sectior	24.A, complete the	following table for each pollutant that will trigger
	EPN	Pollutant	BACT/LAER	Limitation	Averaging Period	Description of Control Technology/Work Practice Standard(s)
1						

# 25.D. PSD Air Quality Analyses Summary

		A	В	С	D	E	F	G	Н	I	J	K
		Preliminary Screening	Level of	Significant Monitoring	At the Monito	ring Station		Maximum	Modeled +		Modeled PSD	Allowable
Pollu	Averaging Period	Concentrati on (µg/m³)	Significant Impact (µg/m³)	Concentrati on (µg/m³)	Monitored Values (μg/m³)	Modeling Results	Background (µg/m³)	Modeled Concentratio n	Background Concentration (µg/m³)	NAAQS (μg/m³)	Increment Consump tion (µg/m³)	Class II PSD Increment (µg/m³)
D.V.	24-hour		5	10						150		30
PM <sub>10</sub>	Annual		1	-						50		17
	3-hour		25	-						1300		512
SO2	24-hour		5	13						365		91
	Annual		1	•						80		20
NOx	Annual		1	14						100		25
СО	1-hour		2000	_						40000		-
	8-hour		500	575						10000		-
Pb	3-month		-	0.1						1.5		-

25.E Nonattainment New Source Re	view Offsets [LA	.C 33:I	II.517.D.16, LAC 33:III.5	504.D.4 &	5]
Complete this section only if the proposed pro	ject triggers Nonattai	nment N	New Source Review (NNSR).		N/A
This project triggers NNSR review for:	□ NOx		VOC		
NO <sub>x</sub> :					
Is the applicant proposing to use internal offso	ets?			O Yes	● No
If not, identify the source of the offsets.	Company:				
	Facility/Unit:				
	Permit No.:				
Is an ERC Bank Application included with this to LDEQ?	s application, or has c	ın appli	cation already been submitted	O Yes	● No
If the ERC application has already been subm	itted, give the date:				
Identify the emissions units from which the of	fsets will be obtained	(referer	nce specific Emission Point ID n	umbers).	
			•	<u> </u>	
		<b>A</b>			
VOC:					
Is the applicant proposing to use internal offse	ets?			O Yes	● No
If not, identify the source of the offsets.	Company:				
	Facility/Unit:				
	Permit No.:				
Is an ERC Bank Application included with this to LDEQ?	s application, or has c	ın applio	cation already been submitted	O Yes	● No
If the ERC application has already been subm	itted, give the date:				
Identify the emissions units from which the of	fsets will be obtained	(referer	nce specific Emission Point ID n	umbers).	
In order to expedite processing, please be sure	the ERC Bank Appli	cation is	s completed properly. In the cas	se of NOX, th	e document
25.F. Economic Impact					
Answer the following questions.					
How many temporary jobs will be added as a	result of this project?				

How many permanent jobs will be added as a result of this project?

# 25.G Notification of Federal Land Manager [LAC 33:III.504.E.1, LAC 33:III.509.P.1]

Complete this section only if the proposed project triggers NNSR or PSD. a. Is the proposed facility or modification located within 100 kilometers of a Class I Area? O Yes O No If Yes, determination of Q/d is not required; skip to the next question. If No, complete the Q/d equation below:  $PM_{10 \text{ (NEI)}} + SO_{2 \text{ (NEI)}} + NO_{X \text{ (NEI)}} + H_2SO_{4 \text{ (NEI)}}$ net emissions increase of PM101,2 PM<sub>10 (NEI)</sub> O/d =net emissions increase of SO21,2 SO<sub>2 (NEI)</sub> net emissions increase of NO<sub>x</sub><sup>1,2</sup>  $NO_{X(NEI)}$ net emissions increase of H<sub>2</sub>SO<sub>4</sub><sup>1,2</sup> H<sub>2</sub>SO<sub>4 (NEI)</sub> distance to nearest Class I Area3 Class I km Q/d =If Q/D < 4, proceed to Section 26. If  $Q/D \ge 4$ , complete the remainder of this Section. b. Has the applicant provided a copy of the application to the Federal Land Manager? O Yes O No c. Does the application contain modeling that demonstrates no adverse impact on Air Quality Related Yes O No Values (AQRVs) in the Class I Area? □ VISCREEN □ PLUVUE II □ CALPUFF Other<sub>4</sub>: d. If Yes, indicate the model used: e. Has the Federal Land Manager concurred that the proposed project will not adversely impact any O No Yes AORVs? If Yes, please attach correspondence. <sup>1</sup>If the net emissions increase of any pollutant is negative, enter "0." <sup>2</sup>If the project did not trigger a netting analysis, use the project increase. In this case, the value will be less than the pollutant's <sup>3</sup>In kilometers. <sup>4</sup>Model must be approved by LDEQ and the Federal Land Manager.

26. Environmental Assessment Statement (EAS or "IT" Question Responses) [La. R.S. 30:2018]

This section is required when ap Any applications for these perm considered to be administratively	it types that				Yes ● No
For new Part 70 operating permits	and/or major	modifications, answ	vers to these questions must be	provided by th	e applicant to the
Name of Local Go	verning Autho	ority	Name of Desig	nated Public Li	brary
Office of the Ma	ayor-Preside	nt			
Street or 1	P.O. Box		Street	or P.O. Box	
222 St. Louis	St., 3rd Flooi		7373	Scenic Hwy	
City	State	Zip Code	City	State	Zip Code
Baton Rouge	LA	70802	Baton Rouge	LA	70807

Answer the following five questions on separate pages using full and complete answers. Include as many pages as necessary in order to provide full and complete answers. This information is required per Louisiana Revised Statutes 30:2018 (La. R.S. 30:2018).

# PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	•	0	0	
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	•	0	0	AAE - Section 10
517.B.3 Certification	Does the Application Include Certification by a Professional Engineer or their Designee:	•	0	0	AAE - Section 10
517.D.1 Identifying Information	Does the Application Include:				
	1. Company Name, Physical and Mailing Address of Facility?	•	0	0	AAE - Section 2
	2. Map showing Location of the Facility?	•	0	0	Appendix A
	3. Owner and Operator Names and Agent?	•	0	0	AAE - Section 1
	4. Name and Telephone Number of Plant Manager or Contact?	•	0	0	AAE - Section 11
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	0	0	•	No change from current permit
	Does the Application Include the Source's SIC Code?	•	0	0	AAE - Section 5
	Does the Application Include EPA Source Category of HAPs if applicable?	0	0	•	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	•	0	0	AAE - Section 24
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	•	0	0	AAE - Section 24
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	•	0	0	Text - Section 1, AAE - Section 2, 24, and 25
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	•	0	0	AAE - Section 24
517 D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	•	0	0	AAE - Section 23, 24
517.D.9 Calculations	Are Emission Calculations Provided?	•	0	0	Appendix B
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	•	0	0	AAE - Section 23
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	0	0	•	
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33.III.5111)?	0	0	•	
517.D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	0	0	•	No change

# PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K, L, and M?	0	0	•	
517 D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	0	0	•	
517.D.16, 18	Has any Additional Information been Provided?	•	0	0	Text
517.D.17 Fees	Has the Fee Code been Identified?	•	0	0	Text - Section 5
	Is the Applicable Fee Included with the Application?	•	0	0	
517.E.1 Additional Part 70 Requirements	Does the Certification Statement Include a Description of the Compliance Status of Each Emission Point in the Source with All Applicable Requirements?	•	0	0	AAE - Section 10
517E.2 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will continue to Comply with All Applicable Requirements with which the Source is in Compliance?	•	0	0	AAE - Section 10
517.E.3 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will, on a timely basis, meet All Applicable Requirements that will Become Effective During the Permit Term?	•	0	0	AAE - Section 10
	Are there Applicable Requirements for which the Source is not	0	•	0	
Part 70 Requirements	in Compliance at the Time of Submittal?  Does the Application include a Compliance Plan Schedule?	0	0	•	
	Does the Schedule Include Milestone Dates for which	0	0		
	Significant Actions will occur?  Does the Schedule Include Submittal Dates for Certified	0	0		•
	Progress Reports?				
517.E.5 Additional Part 70 Requirements	Is this Source Covered by the Federal Acid Rain Program?	0	•	0	
Acid Rain	Are the Requirements of LAC 33.III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	0	0	•	
517.E.6 Additional Part 70 Requirements	Have any Exemptions from any Applicable Requirements been Requested?	•	0	0	AAE - Section 23
Tare to requirement	Is the List and explanations Provided?	•	0	0	AAE - Section 23
517.E.7 Additional Part 70 Requirements	Does the Application Include a Request for a Permit Shield?	0	0	•	No new shield requested
	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding	0	0	•	
517.E.8 Additional Part 70 Requirements	Does the Application Identify any Reasonably Anticipated Alternative Operating Scenarios?	0	•	0	
·	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including	0	0	•	
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	0	•	0	

## PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	N/A	Location Within the Permit Application
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting for the Change?	0	0	•	not a minor mod
	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	0	0	•	not a minor mod
	Does the Certification also Request that Minor Modification Procedures be Used?	0	0	•	not a minor mod
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	0	0	•	not a minor mod
La. R.S. 30:2018 – PSD/NNSR only	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 26) been sent to the local governing authority at no cost to the local governing authority?	0	0	•	not PSD/NNSR
	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 26) been sent to the designated public library at no cost to the designated public library?	0	0	•	not PSD/NNSR

# **SECTION 3.0**

APPLICABLE REGULATIONS, AIR POLLUTION CONTROL MEASURES, MONITORING, AND RECORDKEEPING

Source ID	Source Description		LAC 33:III.Chapter															
BOGIOG ID	Codice Description	5	9	11	13	15	2103	2104	2111	2113	2116	2123	22	29	51	53	56	59
							<u> </u>											
There are no o	changes to applicable regulations	with this	s permit	modifi	cation a	pplicati	ion.											
																		***********
																	<b></b>	

Source ID	Source Description	40 CFR 60				40 CFR 61					40 CFR 63					40 CFR		
	Coulde Description	A	Kb	Db	W		Α	F	V	Α	F	G	Н			64	68	82
There are no c	hanges to applicable regulation	s with thi	s permit	modifi	cation a	policati	on.	-	<del> </del>						-			
		_		<u> </u>		<u> </u>		ļ		<u> </u>		<u> </u>						
		<del> </del>	<b></b>	<u> </u>		_		_	<del> </del>	-			<del>                                     </del>		<del>                                     </del>			<b>—</b>
				i					1				$\vdash$	<del> </del>				

#### KEY TO MATRIX

- 1 (Applicable) The regulations have applicable requirements that apply to this particular emissions source. This includes any monitoring, recordkeeping, or reporting requirements.
- 2 (Exempt) The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- 3 (Does Not Apply) The regulations do not apply to this emissions source. The regulations may have applicable requirements that could apply to this emissions source but the requirements do not currently apply to the source due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place.

Blank - The regulations clearly do not apply to this type of emission source.

#### For each Emission Point ID Number:

- · List each regulation that applies.
- Arrange the requirements imposed by each regulation according to the headings provided below.
  Repeat this process for each regulation that applies to each source.
  State-only Requirements should be noted as such in the appropriate column.

Source		Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement	Existing Specific Req't No. (if any)	Action	In Air Reqt's Library?
This	<u>table o</u>	nly lists requirements	that are being modified or clarified						
100 100 100 100 100 100 100 100 100 100			Requirements that limit emissions or operations - Nitrogen oxides <=0.10 lb/MMBTU heat input (expressed as NO2), except as provided in 40 CFR 60.44b(k). The nitrogen oxide standards apply at all times, including periods of startup, shutdown, or malfunction. Subpart Db. [40 CFR 60.44b]	40 CFR 60.44b	Thirty-day rolling average	no	272	keep	Y
			oxides emission rates as specified in 40 CFR 60.48b(d), except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR	40 CFR 60.48b(b)(1)	One-hour average	no		add	Y
			60.48h/h)(1)1 Oxygen or Carbon dioxide monitored by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48h/h)(1)1	40 CFR 60.48b(b)(1)	One-hour average	no		add	Y
6	-90		Operate NOx continuous monitoring systems and record data during all periods of operation except for continuous monitoring system breakdowns and repairs. Record data during calibration checks, and zero and span adjustments. Subpart Db. [40 CFR 60.48b(c)]	40 CFR 60.48b(c)		no		add	Υ
-	0153 ne Boiler	40 CFR NSPS Subart Db	Follow the procedures under 40 CFR 60.13 and 40 CFR 60.48b(e)(1) through (e)(3) for installation, evaluation, and operation of the NOx continuous monitoring system. Subpart Db. [40 CFR 60.48b(e)]	40 CFR 60.48b(e)		no		add	N
	SCO)		When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, obtain emission data by using standby monitoring systems, 40 CFR 60, Appendix A, Method 7, Method 7a, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days. Subpart Db. [40 CFR 60.48b(f)]	40 CFR 60.48b(f)		no		add	
-			Comply with the provisions of 40 CFR 60.48b(b), (c), (d), (e)(2), (e)(3), and (f), or monitor steam generating unit operating conditions and predict nitrogen oxides emission rates as specified in a plan submitted pursuant to 60.49b(c). Subpart Db. [40 CFR 60.48b(c)]	40 CFR 60.48b(g)		no	273	keep	Y
			Permit specific requirements pertaining to NOx and O2 CEMs become effective upon installation of the NOx analyzer in 1H2010.	40 CFR 60 Subpart Db		no		add	N

Source	†D	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement	Existing Specific Req't No. (if any)	Action	In Air Reqt's Library?
	1		Requirements that specify records to be kept and requirement.	s that specify record reten	ıtion time -				
			provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b/b)(1)]	40 CFR 60.48b(b)(1)		no		add	Y
			except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40.CFR.60.48b(b)(1)]	40 CFR 60.48b(b)(1)		no		add	Y
			Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Subpart Db. [40 CFR 60.49b(d)]	40 CFR 60.49b(d)		no		add	Y
6	·90	40 CFR NSPS Subart Db	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the information listed in 40 CFR 60.49b(g)(1) through (g)(10) for each steam generating unit operating day, except as provided under 40 CFR 60.49b(g). Subpart Db. [40 CFR 60.49b(g)]	40 CFR 60.49b(g)		no		add	Y
EQT	0153		Requirements that specify reports to be submitted -				•		
	je Boiler BCO)		Submit the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in 40 CFR 60 Appendix B to DEQ. Subpart Db. 140 CFR 60 49h(b)	40 CFR 60.49b(b)		nó		add	Y
				40 CFR 60.49b(h)		no	274	keep	Y
			Submit reports containing the nitrogen dioxide emission rate information recorded under 40 CFR 60.49b(g), Subpart Db. [40 CFR 60.49b(i)]	40 CFR 60.49b(i)		no	275	keep	Y
			Requirements that specify performance testing -						
			Determine compliance with the NOx standards in 40 CFR 60.44b through performance testing under 40 CFR 60.46b(e) or (f), or under 40 CFR 60.46b(g) or (h), as applicable. Subpart Db. [40 CFR 60.46b(c)]	40 CFR 60.46b(c)		no		add	Y
			Permit specific requirements pertaining to the 30-day performance test per 40 CFR 60.46b(e), become effective upon installation of the NOx CEMs in 1H2010.	40 CFR 60 Subpart Db		no		add	N
		40 CFR NSPS Subart A	All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A. [40 CFR 60]	40 CFR 60	<u> </u>	no		add	Y

Source	ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement	Existing Specific Req't No. (if any)	Action	In Air Reqt's Library?
			Requirements that limit emissions or operations -						
			Effective January 1, 2011, limit boiler operation to an annual capacity factor of 10 percent or less for natural gas.	40 CFR 60.44b(k)		no		add	N
			Requirements that specify records to be kept and requirement.  Record and maintain records of the amount of each fuel combusted during each calendar month [40 CFR 60.49b(d)(2)]		ntion time -	no		add	N
			Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Subpart Db. [40 CFR 60.49b(d)]	40 CFR 60,49b(d)		no	280	delete-not req'd for <10% capacity boilers	Y
	06 0186	40 CFR NSPS Subart Db	Maintain all records required under 40 CFR 60,49b for a period of 2 years following the date of such record. Subpart Db. [40 CFR 60,49b(o)]	40 CFR 60.49b(o)		no	281	delete - superceded by Part 70 General Condition I	Y
	l Boiler man)		Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the calendar date, the number of hours of operation, and the hourly steam load for each steam generating unit operating day. Subpart Db. [40 CFR 60.49b(p)]	40 CFR 60.49b(p)		no	282	keep	Y
			Requirements that specify reports to be submitted -						A
				40 CFR 60.49b(b)		no	279	keep	Υ
			Submit a report to DEQ containing the annual capacity factor over the previous 12 months, the average fuel nitrogen content during the reporting period if residual oil was fired, and all other applicable information per 40 CFR 60.49b(q)(1) through (q)(3). Subpart Db. [40 CFR 60.49b(q)]	40 CFR 60.49b(q)		no	283	keep	Y
		40 CFR NSPS Subart A	All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A. [40 CFR 60]	40 CFR 60		no		add	Y

Source ID	Applicable Requirement	Compliance Method/Provision	Compliance Citation	Averaging Period/Frequency	State Only Requirement	Existing Specific Req't No. (if any)	Action	In Air Reqt's Library?
		Requirements that specify monitoring -						
Fug-TS FUG 0003		Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.1.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, monitor within 5 days by the methods specified in Subsection P.2. [LAC 33:III.5109.A]	LAC 33:III.5109.A	weekly	yes	183	delete - does not apply to pumps with dual mechanical seals	¥
Treatment Services Fugitive Emissions	2.000	Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1. [LAC 33:III.5109,A]	LAC 33:III.5109.A	weekly	yes		add	Ý

Source ID	Requirement	Exempt or Does Not Apply	Explanation	Citation Providing for Exemption or Non-applicability
There are no o	changes to exempt status or non-appli	cabily from the curren	t permit .	

Enter each single emission point that routes its emissions to another source (i.e., a control device) or a common stack, or is part of an Emissions Cap. List the emissions source to which each single emission point is routed or the Cap of which the source is a member, if applicable. Consult instructions.

Source ID	Description	Construction Date	Routes to:	Operating Rate/Volume	Applicable Requirement(s)?
<u></u>					Y/N
There are no c	hanges to the equipment list.				Y/N
					Y/N
					Y/N

# **SECTION 4.0**

# EMISSION INVENTORY QUESTIONNAIRE FOR AIR POLLUTANTS

							State of	Louisiana	1						Date of Sut	omittal
					<b>Emissions</b>	Inventory	Questio	nnaire (E	IQ) fo	or Air Poi	lutants				Septembe	г 2010
	sion Point ID Alternate ID)			Descriptive	e Name of the En	nissions Sou	urce (Alt. Na	ıme)			Approximate Loc	ation	of Stack or	Vent (see in	structions)	
	28									Method UTM Zone	28 - "GPS-l 15 Horizontal			Datum Vertical		D 83 i01 mN
	Subject Item	ID No.		G	BASOLINE ST	ORAGE "	TANK		þ	Latitude Longitude	30 degrees	30	min 32 min 16	sec <u>91</u>	hundredths	3
Stack and E Phys Characte	sical	Diameter Stack Disch Area	arne He	eight of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Stat	k Gas Exit	Opera	lormal ating Time s per year)	Date of Construction			of Annual This Emis	sion Point	
Chan No	ige?	N/A N/A		N/A ft	N/A ft/sec	NA	ft*/min Ar	nbient °F	<b>l</b> '	8760			25%	25%	25%	25%
	Type of Fue			ut (see instruct	ions)		<u> </u>			Operating	Parameters (incl	ude u	nits)		<u> </u>	
uel	Type of Fuel Heat Input (MM Btu/hr)										/Parameter			Descript	ion	
a b c	N/A N/A						Operating R	e/Throughpu ate/Through ne		10,000 10,000 1000						
			Notes			Shell Heigh					6					
		-				Tank Diam					5.33					
						Roof Type					xed roof					
								ecific Info	rmatic	n						
(A	ssion Point ID No. (Alternate ID)		Control Control Equipment Equipment	ent HAP/TAP CAS		ed Emissio Maximum	n Rates Annual		ermitted sion Rate	Add, Change, Delete, or		ntinuous mpliance	Concentra	tion in Gase	es Exiting a	
	Pollutant		Code	Efficiency	Number	(lb/hr)	(lb/hr)	(tons/yr)		ons/yr)	Unchanged		Viethod		Stack	
	PM <sub>10</sub>		000													
	SO₂		000													
	NOx		000													
	ÇO		000													
	VOC Total		000		N/A	0.07	-	0.29		0.05	<u> </u>					
_	Benzene		000		71-43-2	0.001	-	<0.01		<0.01	C U			ļ		
	thyl benzene n-Hexane	<del>)</del>	000		100-41-4 110-54-3	<0.001 0.001	-	<0.01 <0.01		<0.01 <0.01	C			-		
	n-nexane Trimethylpen	ntane	000		540-84-1	0.001	<del>-</del>	<0.01		<0.01	C	$\vdash$				
£,4,4-1	Toluene	naile	000		108-88-3	0.001	<del>                                     </del>	<0.01	-	<0.01	C	$\vdash$		<del> </del>		
	Xylene		000		1330-20-7	<0.001	-	<0.01	-	<0.01	ŭ					
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PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE BOILER (ABCO)  PACKAGE STAT MINITED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF MAINTED (ABCRESS SOCIAL STATE ABOUT THE LATION OF								State o	of Louisian	a					T	Date of Sut	mittal		
Alternate ID    A-90     A-90     A-90     A-90     A-90   A-90     A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-90   A-						Emissions	Inventory	Quest	tionnaire (E	EIQ) f	or Air Po	llutants				Septembe	г 2010		
TEMPO Subject Item ID No.   EQT153	1				Descriptiv	e Name of the En	nissions Sou	ırce (Alt.	Name)			Approximate Loc	cation	of Stack or	Vent (see in	structions)			
Stack and Discharge Physical Characteristics Change?   No   No   No   No   No   No   No   N		6-90													Datum		D 83		
Physical Characteristics	TEMPO	•	n ID No.			PACKAGE BO	OILER (AE	BCO)			Latitude	30 degrees	30	min 35		hundredths			
Change?   3.5 ft   60 ft   25 ft/sec   14,000 ft/min   850 °F   8760   1990   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%	Phy	/sical	Stack Discl		•		at Conditi	ons, S		Oper	rating Time	B .			This Emis	sion Point	<u>-</u>		
Type of Fuel	Cha	nge?	3.5		60 ft	25 ft/sec			850 °F	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	' '	1990				25%	25%		
Type of Fuel		Type of Fu	el Used and	Heat In	nput (see instruc	tions)				1	Operating	Parameters (incl	ude u	nits)			1.		
Maximum Operating Rate/Throughput Design Capacity/Volume		Type	of Fuel												Descript	ion			
Design Capacity/Volume		Natur	al Gas		5	0	Normal Op	erating R	tate/Throughpo	ıt					Natural C	3as			
Notes   Shell Height (ft)   Tank Diameter (ft)   Roof Type								-	-	put					Natural C	3as			
Tank Diameter (ft)   Roof Type									lume		N/A				N/A				
Control   Control   Equipment   Code   Proposed Emission Rates   Permitted   Add, Change,   Continuous   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Compliance   Co							Tank Diam												
Control Equipment Code   Control Equipment Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code	Emis	ssion Point II	L				Air Pol	lutant S	Specific Info	rmati	on								
Pollutant   Equipment Code   Equipment Code   Equipment Code   Equipment Code   Equipment Code   Number   Number   Average (lb/hr)   Maximum (lb/hr)   Equipment (lb/hr)   Equipment Code   Equipment Code   Equipment Efficiency   Number   Average (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment Code   Equipment Code   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/hr)   Equipment (lb/h	(	(Aiternate ID	)				Propos	ed Emis	sion Rates	Τ		A 1.1 OL							
PM <sub>10</sub> 000         N/A         0.60         1.27         2.63         2.63         U           SO <sub>2</sub> 000         7446-09-5         0.27         0.58         1.20         1.20         U           NOx         000         N/A         4.00         21.20         17.52         17.52         C           CO         000         630-08-0         8.85         18.76         38.76         38.76         U			<b>6-90</b> Eq		nent Equipment			1		Emi	ssion Rate	Delete, or	Compliance		Concentrat	tion in Gase Stack	s Exiting at		
SO <sub>2</sub> 000         7446-09-5         0.27         0.58         1.20         1.20         U           NOx         000         N/A         4.00         21.20         17.52         17.52         C           CO         000         630-08-0         8.85         18.76         38.76         38.76         U				000	<u>,                                      </u>	N/A	0.60	4 07	2.62	<del>                                     </del>	0.00	11							
NOx         000         N/A         4.00         21.20         17.52         17.52         C           CO         000         630-08-0         8.85         18.76         38.76         38.76         U								<u> </u>		+									
CO 000 630-08-0 8.85 18.76 38.76 U																			
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:		State of Louisiana Emissions Inventory Questionnaire (EIQ) for Air Pollutants												Date of Sub	mittal	
					<b>Emissions</b>	Inventory	/ Questi	onnaire (E	IQ) f	or Air Pol	lutants			September	r 2010	
Emi	ission Point II (Alternate ID			Descriptiv	e Name of the En	nissions Sot	arce (Alt. N	lame)			Approximate Location	n of Stack or	Vent (see in	structions)		
	M1a				LINIT O COOL	INO TOV	VED			Method UTM Zone	28 - "GPS-Uns 15 Horizontal 6		Datum Vertical		D 83 12 mN	
TEMP	C Subject Iter	n ID No.			UNIT 2 COOL	ING TOV	VER			Latitude Longitude		min 39		hundredths hundredths		
	d Discharge	Diameter Stack Discl	arral H	leight of Stack	Stack Exit	Stack Gas	one   Sta	ack Gas Exit		Normal rating Time	Date of Construction	Percen		Throughput	through	
Chara	cteristics ange?	Area N/A	`   '	Above Grade	Velocity	not at Star	naara	emperature		rs per year)	or Modification	Jan - Mar	Apr - Jun	Jul - Sep		
	No	N/A		N/A ft	N/A ft/sec	N/A	ft³/min	N/A °F		8760	~2004	25%	25%	25%	25%	
Fuel	Type of Fu		neat in	put (see instruct Heat Input (							Parameters (include /Parameter	units)	Descript	ion		
a		/A		N/		Normal On	erating Ra	te/Throughpu	ŧ	36,000			recirculatio			
ь							_	Rate/Through		N/A		N/A				
С						Design Cap				N/A			N/A			
			Notes			Shell Heigh										
						Tank Diam	eter (ft)									
						Roof Type										
Em	ission Point II	O No.				Air Po	llutant S	pecific Info	rmati	ion						
	(Alternate ID	)	Control Control LIARTAR CAS		Propos	ed Emissi	on Rates	П	ermitted	Add, Change,	Continuous					
	M1a		Equipme Code	ent Equipment	HAP/TAP CAS Number	Average (lb/hr)	Maximun (lb/hr)	Annual (tons/yr)	Emi	ission Rate (tons/yr)		Compliance Method	Concentra	tion in Gase Stack	es Exiting at	
	Pollutant						(10/111)		,		<u> </u>	Method				
	PM <sub>10</sub>		000		N/A	12.85	-	56.28		0.32	С					
	SO <sub>2</sub>		000		7446-09-5	-	-	-								
	NOx CO		000		N/A	<u>-</u>	-	-								
	VOC Total		000		630-08-0 N/A	-	-	<del>                                     </del>								
	VOO TOILLI		000		(1)/1	_										
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							State of	Louisiana	1	~~~~				Date of Sub	omittal	
					Emissions	Inventory	Questic	onnaire (E	IQ) f	or Air Pol	llutants			September	r 2010	
E .	ssion Point II (Alternate ID	1		Descriptiv	e Name of the En	nissions Sou	ırce (Alt. N	ame)			Approximate Loca	ition of Stack or	Vent (see i	nstructions)		
	M1b				LINIT 4 COOL	INC TO	VED			Method UTM Zone	28 - "GPS-Ui 15 Horizontal		_ Datun Vertica		D 83 23 mN	
TEMPO	Subject Iter EQT155	n ID No.			UNIT 1 COOL	ING TOV	VER			Latitude Longitude		30 min 33 11 min 12		hundredths hundredths		
Phy Charae Cha	d Discharge ysical cteristics ange?	Diameter Stack Discl Area N/A	narge H	leight of Stack Above Grade N/A ft	Stack Exit Velocity N/A ft/sec	Stack Gas at Conditi not at Star	ons, Sta	ck Gas Exit emperature N/A °F	Oper (hour	Normal rating Time rs per year) 8760	Date of Construct or Modification	ion	This Em	Throughput ssion Point Jul - Sep 25%		
	No	N/A				11// 1					D		2070	2070	2070	
Fuel	Type of Fuel Used and Heat Input (see instructions)  Type of Fuel Heat Input (MM Btu/hr)										Parameters (include/Parameter	de units)	Description			
a b c	a N/A N/A b c					Maximum ( Design Car	Operating Foodity/Volume	e/Throughpu Rate/Through me		16,000 gpm N/A N/A			recirculation rate			
			Notes			Shell Heigh Tank Diam Roof Type					:					
Emi	ssion Point II	O No.		· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	Air Pol	lutant Sp	ecific Info	mati	on						
	sion Point ID No. (Alternate ID)  M1b		Contro Equipme		HAP/TAP CAS		ed Emission	on Rates	P	ermitted ssion Rate	Add, Change, Delete, or	Continuous Compliance	Concentra	ation in Gase	es Exiting at	
	Pollutant		Code	Efficiency	ment Number	(lb/hr)	(lb/hr)	(tons/yr)	(1	tons/yr)	Unchanged	Method		Stack		
	PM <sub>10</sub>		000		N/A	5,71		25,01	┢	0.14	С					
	SOz					-,,,,										
	NOx															
	CO															
	VOC Total			_			-		_							
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							State of	Louisiana	1			<del></del>	T	Date of Sub	mittal	
					<b>Emissions</b>	Inventory	Questi	onnaire (E	IQ) f	or Air Po	llutants			Septembe	r 2010	
Emi	ission Point II			Descriptiv	e Name of the En	nissions Sou	urce (Alt. N	lame)			Approximate Locat	ion of Stack or	Vent (see in	nstructions)		
	(Alternate ID	)								Method	28 - "GPS-Un		Datum	•	D 83	
	M3			TR	EATMENT SE	:P\/ICES	SLIMDS				15 Horizontal (		Vertical			
TEMP	O Subject Iter	n ID No.			LATIVILITI OL	.IXVIOLO	OOMI O			Latitude		30 min 37		hundredths		
	ARE 0003	3								Longitude	91_degrees1	11 min 9	_sec22	_ nunareatns	3	
Ph	d Discharge ysical cteristics	Diamete Stack Disc	harge He	eight of Stack	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Sta	ick Gas Exit emperature	Ope	Normal rating Time	Date of Construction	<sup>2</sup>	This Emi	Annual Throughput throu his Emission Point pr - Jun   Jul - Sep   Oct		
	hange? N/A ft N/A ft N/A ft/sec  Yes N/A ft² N/A ft N/A ft/sec  Type of Fuel Used and Heat Input (see instructions)  Type of Fuel Heat Input (MM Btu/hr)  N/A Norm Max				(nou	rs per year)		Jan - Mar	1	†	Oct - Dec					
				N/A ft	N/A ft/sec	N/A	ft <sup>s</sup> /min A	mbient °F		8760		25%	25%	25%	25%	
			Heat Inp								Parameters (includ	e units)				
Fuel a						Normal On	eratina Dat	te/Throughpu	+		e/Parameter gal/day		Descrip flowra			
b	N/A N/A							Rate/Through		2500 N/A	~ ,	N/A				
C							pacity/Volu		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	N/A			N/A			
			Notes			Shell Heigh										
Refer to the	ne process ar	oun "TS Pro	ocess" for	speciated TAF	D <sub>S</sub>	Tank Diam	eter (ft)									
						Roof Type										
Em	ission Point II							ecific Info	rmati	on						
	(Alternate ID	Souted Control			HADGED OAG	Propos			ermitted	Add, Change,	Continuous					
	M3 Pollutant		Equipment Equipment Code Efficiency HAP/TAP CAS		Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)		nission Rate Delete, or (tons/yr) Unchanged		Compliance Method	Concentra	ttion in Gase Stack	es Exiting at		
	PM <sub>10</sub>		1			<del> </del>	<del> </del>						l I			
	SO <sub>2</sub>								1							
	NOx															
	CO				\$178	2.00										
·····	VOC Total		000		N/A	0.02	-	0.07	┢	0.07	U					
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						,		State of	Louisiana	1						Date of Sub	mittal
						<b>Emissions</b>	Inventory	/ Questic	nnaire (E	IQ) f	or Air Pol	lutants				September	r 2010
	Emission (Alte	Point ID	No.		Descriptiv	e Name of the En	nissions So	ırce (Alt. N	ame)			Approximate Loca	ation of	f Stack or	Vent (see ir	structions)	
		M10									Method	28 - "GPS-U			Datum		D 83
┝╤	EMPO Sub	niect Item	ID No			Diesel Fire-\	Water Pui	mp			UTM Zone Latitude	15 Horizontal			Vertical		
l ''			ID NO.											nin <u>37</u>		hundredths hundredths	
<u> </u>		N/A														•	
	ck and Disc Physical	ı [s	Diameter Stack Disch	arne H	eight of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi	ons, Sta	ck Gas Exit mperature	Oper	Normal rating Time	Date of Construct or Modification	, L		This Emis	Throughput sion Point	
	Characteris Change		Area	ft		Ţ	not at Star	ndard	•	(hou	rs per year)		Ŀ	Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
	Yes	·		ft²	ft	ft/sec		ft³/min	°F		500	before July 200	)5	25%	25%	25%	25%
		e of Fuel			out (see instruc	tions)					Operating	   Parameters (înclu	de unit	ts)	i		1
Fuel											Value	/Parameter			Description		
a									te/Throughput 200 HP Rate/Throughput								
b							Maximum ( Design Car	-	-	put							
٣	<u> </u>			Notes			Shell Heigh		i ie								
<u>.                                    </u>					_		Tank Diam										
Maxi	mum lbs/h	r not appi	ropriate for	this type	e of source.		Roof Type										
	Emission	Point ID	No.					lutant Sp	ecific Infor	mati	on	I_				••••	
	(Alte	rnate ID)		0				ed Emission			ermitted	Add Observe	0				
		M10	Code Efficiency Number		HAP/TAP CAS Number	Average	Maximum (lb/hr)		Emi	ssion Rate	Add, Change, Delete, or Unchanged	Continuous Compliance Method		Concentra	tion in Gase Stack	s Exiting at	
		ollutant			Emolorio		(lb/hr)	(10/111)	(tons/yr)	· · ·							
<u> </u>		PM <sub>10</sub>		000		N/A	0.44		0.11			A					
		SO₂ NOx		000		7446-09-5 N/A	0.41 6.20		0.10	<u> </u>		<u> </u>					
		CO		000		630-08-0	1.34		1.55 0.33	<u> </u>		A					
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# SECTION 5.0 EMISSION CALCULATIONS

## Gasoline Storage Tank EIQ 28

**Inputs to Tanks Program** 

inputs to ranks r rogiam						
Type of Tank	horizontal					
shell length (ft)	6.0					
diameter (ft)	5.33					
Volume (gals)	1000					
Turnovers per year	10					
Net Throughput (gals/yr)	10,000					
Is Tank Heated?	N					
Shell Color/Shade	gray/medium					
shell condition	good					
vacuum settings (psig)	-0.03125					
pressure settings (psig)	0.50					
contents	gasoline (RVP 10)					

**Results From Tanks Program** 

Annual Emissions (lbs/yr)	1	577.66

**Pollutant Speciation** 

	Vapor Weight % <sup>2</sup>	Average (lb/hr)	Annual (tons/yr)
Hexane (Total)	1.6	0.0011	0.005
Benzene	0.9	0.0006	0.0026
Toluene	1.3	0.0009	0.004
2,2,4 Trimethyl- pentane	0.8	0.0005	0.0023
Ethylbenzene	0.1	0.00007	0.00029
Xylenes	0.5	0.0003	0.0014
Total VOC		0.07	0.29

# References:

<sup>&</sup>lt;sup>1</sup> From TANKS 4.0.9d Emissions Reports.

<sup>&</sup>lt;sup>2</sup> Compilation of Air Emission Factors for Petroleum Distribution and Retail Marketing Facilities, Table 3-3, Average Vapor Phase HAP Fractions of Gasoline Products, 9/95.

## **TANKS 4.0.9d**

# **Emissions Report - Summary Format Tank Indentification and Physical Characteristics**

identification

User Identification:

Gasoline Tank - new permit

City: State: **Baton Rouge** Louisiana Rhodia

Company: Type of Tank:

Horizontal Tank

Description:

Tank Dimensions

Shell Length (ft):

6.00

Diameter (ft): Volume (gallons):

5.33 1.000.00

Turnovers:

10.00

Not Throughput(gal/yr): Is Tank Heated (y/n):

10,000.00

Is Tank Underground (y/n):

**Paint Characteristics** 

Shell Color/Shade: **Shell Condition** 

Gray/Medium

Good

**Breather Vent Settings** 

Vacuum Settings (psig): Pressure Settings (psig) -0.03

0.50

Meterological Data used in Emissions Calculations: Baton Rouge, Louisiana (Avg Atmospheric Pressure = 14.72 psia)

# TANKS 4.0.9d Emissions Report - Summary Format Liquid Contents of Storage Tank

Gasoline Tank - new permit - Horizontal Tank Baton Rouge, Louisiana

Liquid  Delly Liquid Surf. Bulk Vapor Liquid Vapor Temperature (deg F) Temp Vapor Pressure (psia) Moi. Mass Mess				Mol.	Basia for Vapor Pressure								
Mbdure/Component	Month	Avg.	Min.	Max.	(deg F)	Avg.	Min.	Mex.	Weight.	Fract.	Fract.	Weight	Calculations
Gesoline (RVP 10)	All	77.03	66,57	87.49	70.76	7.1395	5,8808	8.6035	86.0000			92.00	Option 4: RVP=10, ASTM Slope=3

# TANKS 4.0.9d Emissions Report - Summary Format Individual Tank Emission Totals

**Emissions Report for: Annual** 

Gasoline Tank - new permit - Horizontal Tank Baton Rouge, Louisiana

	Losses(lbs)						
Components	Working Loss	Breathing Loss	Total Emissions				
Gasoline (RVP 10)	112.19	465.47					

#### Package Boiler EIQ 6-90

Op. Schedule =
Average heat input =
Maximum heat input =
Heating Value of Natural Gas =

Heating Value of Natural Gas =

Molecular Weight of S =

Molecular Weight of SO<sub>2</sub> =

8760 hrs per year 50 MMBtu/hr 106 MMBtu/hr 1040 BTU/scf 32 lbs/lbmole

64 lbs/lbmole

Poliutant	Basis	Sulfur Concentration (gr/100 scf)	Average Emissions (lbs/hr)	Maximum Emissions (lbs/hr)	Annual Emissions (tpy)
PM-10	1		0.60	1.27	2.63
Sulfur Dioxide	2	2	0.27	0.58	1.20
Nitrogen Oxides	3,4		4.00	21.20	17.52
Carbon Monoxide	1		8.85	18.76	38.76
VOCs	1		1.40	2.97	6.13

#### Notes:

<sup>3</sup> Average (based on letter from the vendor)

0.08

lb/MMBTU

<sup>4</sup> Maximum (assume on short-term basis, could be

2X the NSPS Db 30-day rolling average limit)

0.20

lb/MMBTU

<sup>&</sup>lt;sup>1</sup> Based on letter from Gordon-Piatt Energy Group, the vendor, adjusted for firing rate, file 402.2.2.

<sup>&</sup>lt;sup>2</sup> Based on the assumption of total conversion of S to SO<sub>2</sub>.

# Sulfuric Acid Plant Cooling Towers EIQ M1a and M1b

The  $PM_{10}$  emission rate is calculated using 1.7 lb/1000 gal total liquid drift factor for induced draft tower (AP-42 Table 13.4-1)  $PM_{10}$  emission rate = (Total Liq. Draft Factor) x (TDS) x (Recirculation Rate)

Description	EIQ ID	Recirculation Rate (gpm)	TDS <sup>1</sup> (ppm)	Average PM-10 Emissions <sup>2</sup> (lb/hr)	Annual PM-10 Emission (tpy)
Unit 1 Cooling Tower	M1b	16,000	3,500	5.71	25.01
Unit 2 Cooling Tower	M1a	36,000	3,500	12.85	56.28

<sup>&</sup>lt;sup>1</sup> Conservative estimate based on samples collected in December 2009.

<sup>&</sup>lt;sup>2</sup> PM<sub>10</sub> emission rate = (Total Liq. Draft Factor) x (TDS) x (Recirculation Rate) where total liquid drift factor for induced draft tower = 1.7 lb/1000 gal (AP-42 Table 13.4-1)

Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana Sulfuric Acid Plant

Unit:

**Sulfuric Acid Plant** 

EIQ I.D.:

M10

Description:

Diesel Fire-Water Pump 20G961

Hours/Year:

500

Horsepower:

200

	Emission	Emissions		
	Factor* lb/hp-hr	lbs/hr	tpy	
PM-10	0.0022	0.44	0.11	
SOx	0.00205	0.41	0.10	
NOx	0.031	6.20	1.55	
CO	0.00668	1.34	0.33	
VOC	0.0025141	0.50	0.13	

<sup>\*</sup>Per AP-42 Table 3.3-1, 10/96

# SECTION 6.0 CERTIFICATE OF GOOD STANDING



# Louisiana Secretary of State COMMERCIAL DIVISION Corporations Database



# Louisiana Secretary of State Detailed Record

Charter/Organization ID: 34605553F

Name: RHODIA INC.

Type Entity: Business Corporation (Non-Louisiana)

Status: Active

Annual Report Status: In Good Standing

Add Certificate of Good Standing to Shopping Cart

Last Report Filed on 02/09/2007

Mailing Address: 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Domicile Address: 1209 ORANGE STREET, WILMINGTON, DE 19801

Principal Office: 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Principal Bus. Est. in Louisiana: 1275 AIRLINE HIGHWAY, BATON ROUGE, LA 70805

Qualified: 01/13/1998

Registered Agent (Appointed 1/13/1998): C T CORPORATION SYSTEM, 8550 UNITED PLAZA BLVD., BATON RC

LA 70809

President: JAMES HARTON, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Director: JAMES HARTON, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

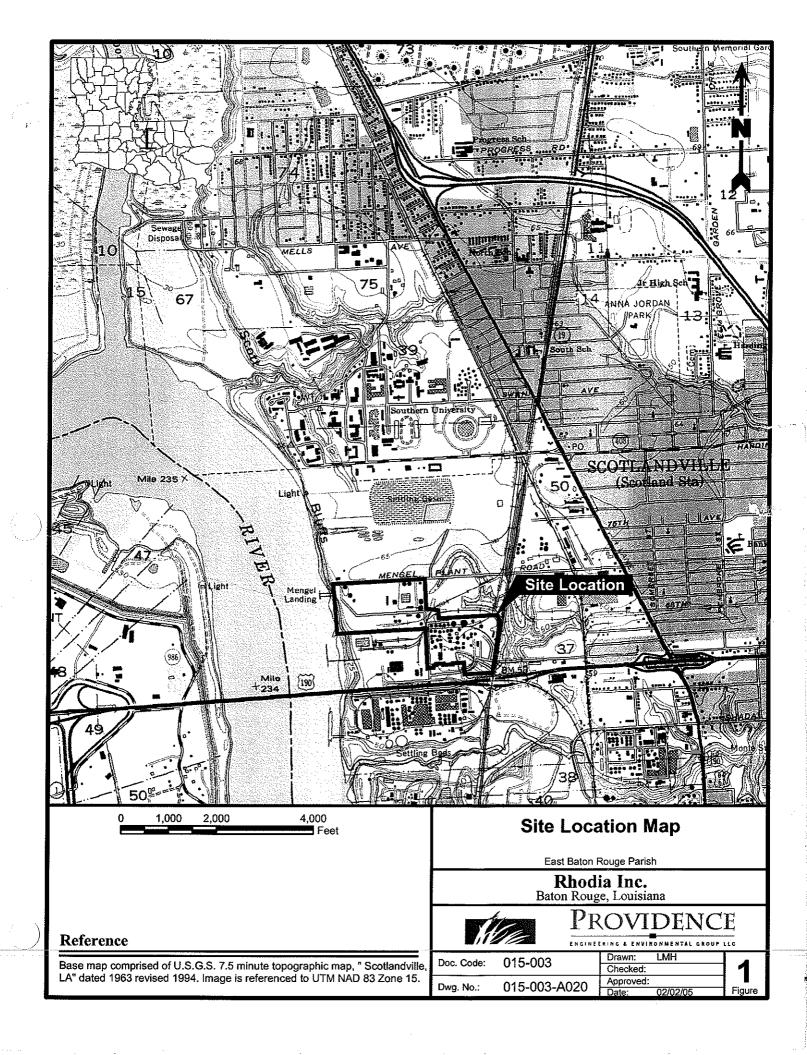
Vice President: JERRY KRING, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Vice President: JOHN P. DONAHUE, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Secretary: JOHN P. DONAHUE, 8 CEDAR BROOK DRIVE, CRANBURY, NJ 08512

Additional officers may exist on document

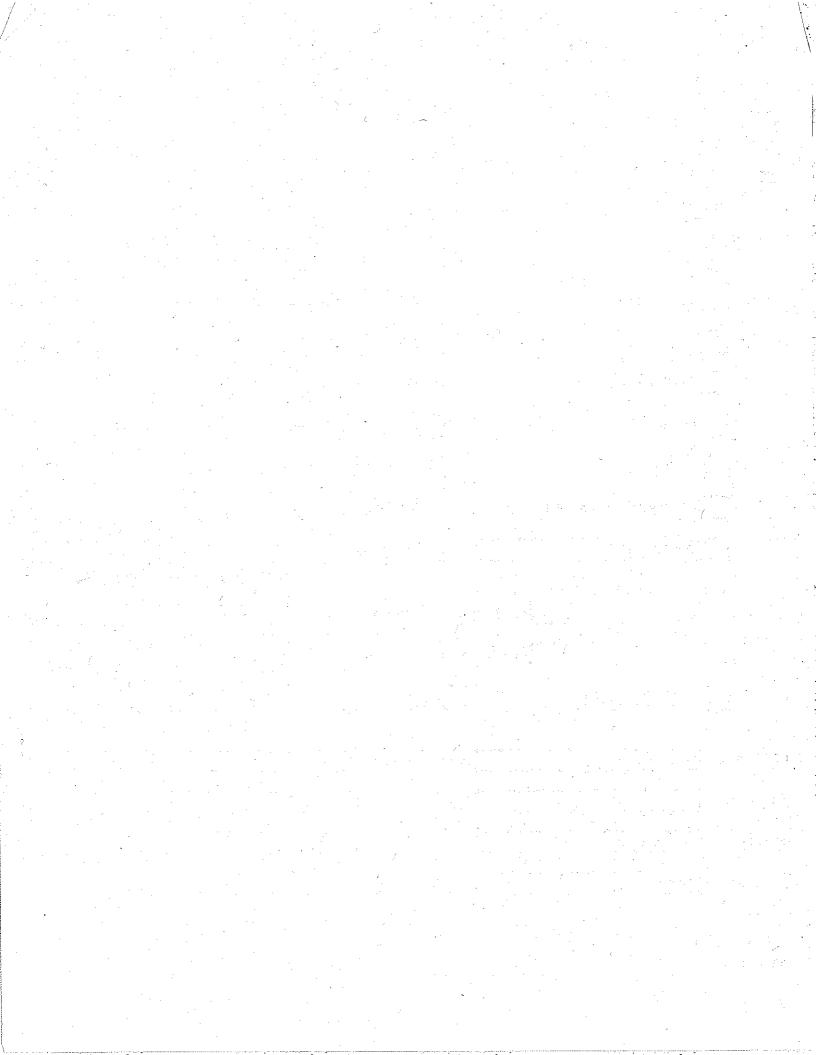
# FIGURE 1 SITE LOCATION MAP



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### AIR, PESTICIDES, AND TOXICS 6TH FLOOR RECORDS CENTER INFILE / NEW FILE FORM

New file:	or Infi	ling: X	
ose from the file types below:			
Air Facility	<u>TSCA</u>		
AR- Acid Rain	AH - Asbestos	s Hazard Emergency Response Act	
CB- Confidential Business	AS or AW - As	sbestos or Asbestos Worker Prot.	
CO- Compliance	CB - Confident	tiai	
EN- ** Enforcement	SI - Site Specif	ic	
GE- General	FO - Non Site S	Specific	
X PE- Permit	IM - ** Section	n 5 * 8	
RA- Regulatory Applicability	LB - ** Lead	Droi Mod	
Other:	PC - **PCB	Proj No: LDEQ AI:	1:
· · · · · · · · · · · · · · · · · · ·	ed): ES - Enforcement Sensitive DP - Docket Number	Permit Type Numb  Minor Pmt No:  PSD Pmt No:  TV Pmt No: 0840-00033-v5  NNSR Pmt No:	er
EPCRA / SARA	FIFRA	CAIR Pmt No: AR Pmt No:	
	<u> </u>		
umber: 11 0000 450 100	Company Name: Rhod	fia Inc	
ame:	Area Name:		
reet: 1275 Airline Hwy	Fac City: Bator	n Rouge	
nty: East Baton Rouge	Fac State: LA	Fac Zip: 70805	
estor's Name: Brad Toups	Material: Application	s Sent To File Room on: Format:	
estor's Phone: 214 - 665 -7258	Permit(s)		





PEGGY M. HATCH SECRETARY

### State of Louisiana

### DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

Certified Mail No. 7005 1820 0002 2092 3155

Activity No.: PER20120011 Agency Interest No. 1314

Mr. Daniel Tate Plant Manager Rhodia, Inc. P.O. Box 828 Baton Rouge, La 70821

RE:

Part 70 Operating Permit

Rhodia Inc

Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Tate:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 11<sup>th</sup> of May, 2016, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this	 _day of	Noung	, 2012
Done this	 _day of _	The control of	, 201

Permit No.: 0840-00033-V5

Sincerely.

Sam L. Phillips Assistant Secretary

SLP:EMC c: EPA Region VI √ RECEIVED
12 NOV 13 PM 5: 3
NIR PERMITS SECTION

10 - 2 - 7.9 - 7.1 - 7.1 - 5.2 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1 - 3.1

Rhodia Inc
Agency Interest No.: 1314
Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

#### I. Background

Rhodia Inc. (Rhodia) operates a Sulfuric Acid Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces sulfuric acid by using two sulfuric acid production trains (Unit No. 1 and Unit No. 2). Unit No. 1 was constructed in 1953 and Unit No. 2 was constructed in 1968. Previously the facility operated under Title V Permit 0840-00033-V0 dated October 12, 2005, Title V General Permit No. 3032-V1 issued December 13, 2006 for the Package Boiler, Title V Permit 0840-00033-V1 issued March 14, 2007 which consolidated the Package Boiler and Sulfuric Acid permits, Title V Permit 0840-00033-V2 issued November 30, 2009, and Title V Permit 0840-00033-V3 issued May 11, 2011. Currently the facility operates under Title V Permit 0840-00033-V4 dated March 15, 2012.

Rhodia has entered into a Consent Decree (Civil Action No. 2:07CV134 WL) with the United States and various State parties including Louisiana, effective July 23, 2007. This Consent Decree requires Rhodia to install controls for SO<sub>2</sub> emissions at their various plant sites nation wide. The requirements for the Baton Rouge Facility have been incorporated into this permit.

#### II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Rhodia, Inc. on September 7, 2012 requesting a Part 70 operating permit.

#### III. Description

#### Sulfuric Acid Plant

Rhodia receives spent sulfuric acid and hazardous waste fuels from off-site sources and recovers the sulfur and energy values in its industrial furnaces, forming fresh sulfuric acid. The sulfuric acid production process begins with treatment of the feed streams in the industrial furnace. Liquids are sprayed using atomizers into the combustion chamber. Normal operating conditions are 2% to 4% excess furnace oxygen and furnace temperature between 1800°F and 2200°F at the furnace discharge. Furnace residence time is approximately three seconds. The feed streams are producing steam for process use. Gas from the waste heat boiler is further cooled and cleaned in the gas scrubbing system. This system includes spray scrubbing and wet electrostatic precipitators to remove acid mist and particulate emissions.

Rhodia Inc
Agency Interest No.: 1314
Rhodia Inc
Baton Rouge, East Baton Rouge Parish, Louisiana

Cooling systems reduce the gas temperature from 600°F to 100°F. The wet gas is then dried through counter-current packed flow columns circulating ≥93% sulfuric acid. Dry gas is heated to 800°F before the sulfur dioxide is converted to sulfur trioxide using catalyst. Because the conversion step to sulfur trioxide is exothermic, the hot exhaust gas is used to heat up the incoming feed by cross-current heat exchange.

Sulfur trioxide from the converter enters a countercurrent packed absorption tower. Strong sulfuric acid absorbs and hydrolyzes the sulfur trioxide to sulfuric acid. Demisters then remove sulfuric acid mist generated in the acid tower and particulate emissions.

The preceding process description pertains to Unit No. 1. The Unit No. 2 process is slightly different. After the drying step, the gas enters a second sulfur burning furnace, followed by a hot gas filter. This added step heats the gas, affording a second occasion for combustion. Unit No. 2 has over twice the capacity of Unit No. 1. Equipment is sized proportionately, with Unit No. 2 having a longer residence time.

#### Waste Storage

Seven tanks have been constructed specifically for the storage of hazardous waste. These seven tanks are located in the truck and rail unloading facility and operate under a nitrogen pad. A positive pressure vent system is tied into Unit No. 2 or to the TS Vapor Combustor to burn all fumes and vapors.

#### Package Boiler

The package boiler provides backup and supplemental steam production to Units No. 1 and No. 2. It is rated for 80,000 lbs/hr steam production with a heat input of 106 MM BTU/hr and is permitted for an annual average heat input of 50 MM BTU/hr. It is fired with natural gas only and is equipped with low-NOx burners and a continuous flue gas oxygen analyzer.

#### Rental Boiler

The rental boiler provides backup steam production to Units No. 1 and No. 2 and the package boiler. It is fired with natural gas only and has a maximum firing rate of 133 MM BTU/hr but is limited to a calendar average firing rate of 12.4 MM BTU/hr per 40 CFR 60.44b(j)(2).

#### SO<sub>2</sub> Abatement Scrubbers and Debottlenecking Project

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As part of Rhodia's consent decree for the Baton Rouge facility, Rhodia has installed packed bed scrubbers on Sulfuric Acid Unit No. 1 and Unit No. 2 to control SO<sub>2</sub> emissions. Also as part of the consent decree, the Environmental Protection Agency (EPA) agreed to allow the Sulfuric Acid Plant to undergo an expansion project. This project will allow the facility to increase its total Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) production from 2,200 tons/day to 2,800 tons/day. Specifically, the capacity of Sulfuric Acid Unit No.1 (EPN 3) will increase from 700 tons/day to 900 tons/day of sulfuric acid, and the capacity of Sulfuric Acid Unit No. 2 (EPN 2) will increase from 1,500 tons/day to 1,900 tons/day. The capacity increase will be accomplished with a series of debottlenecking projects.

Rhodia is requesting the following changes with this permit modification.

1. Reconcile emissions for sulfur feed tank (EQT 0146) to incorporate test results from February 2012.

2. Modify stack physical characteristics for Unit 1 Pre-heater stack (EQT 0140) as it will be

replaced in March of 2013.

3. Reconcile SO<sub>2</sub> emissions to use the AP-42 factor instead of sulfur content of natural gas.

4. Reconcile PM<sub>10</sub> and NO<sub>X</sub> emissions for the Acid Plant Vapor Combustor (EQT 0151) using new natural gas usage data from a recently installed natural gas meter.

5. Update stack discharge characteristics for the TS Vapor Combustor (EQT 0147) and Acid Plant Vapor Combustor (EQT 0151) based on recent testing.

- 6. Modify PM<sub>10</sub> emissions for Oleum Loading Vent Scrubber (EQT 0142), Oleum Barge Loading Scrubber (EQT 0149), and Acid Plant Fugitive Emissions (FUG 0002).
- 7. Update stack gas characteristics for Oleum Barge Loading Scrubber (EQT 0149).
- 8. Reconcile General Condition XVII Activities table.

9. Update specific requirements.

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	58.43*	58.95*	+0.52
$SO_2$	1078.06	1077.96	-0.10
$NO_X$	118.64	118.64	-
CO	103.81	103.81	-
VOC	29.60	29.87	+0.27
HAPs <sup>1</sup>	9.18	9.41	+0.23

<sup>\*</sup>Includes sulfuric acid mist

See Tables A and B for more information on HAP limits

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LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
2,6-Dinitrotoluene	0.04	0.04	<b>-</b>
Ammonia	0.56	0.56	<del>-</del>
Barium (and compounds)	0.18	0.18	<u> -</u> - • •
Chlorine dioxide	0.01	0.01	<del>-</del> ,
Copper (and compounds)	0.11	0.11	-
Diaminotoluene (mixed isomers)	0.12	0.12	· -
Hydrogen sulfide	0.49	2.21	+1.72
Nitric acid	0.14	0.14	<del>-</del>
Pyridine	0.56	0.56	-
Sulfuric Acid	42.38	42.38	· · · · · -
Toluene-2,6-Diisocyanate	0.01	0.01	
Zinc (and compounds)	0.22	0.22	-
n-butyl alcohol	1.00	1.00	
Total TAPs	45.82	47.54	+1.72

	Table	A – Permitted HA	AP Emissions
Source	ID	HAPs (tpy)	How Determined
SAU	GRP 0002	5.694	Sum of individually permitted HAPs in Emission Rate Tables
Sulfur Feed Tank	EQT 0146	0.29	Sum of individually permitted HAPs in Emission Rate Tables
TS Vapor Combustor	EQT 0147	0.38	Sum of individually permitted HAPs in Emission Rate Tables
AP Vapor Combustor	EQT 0151	0.41	Sum of individually permitted HAPs in Emission Rate Tables
Gasoline Tank	EQT 0152	0.06	Sum of individually permitted HAPs in Emission Rate Tables
TS Process	PCS 0002	2.02	Cap on HAPs for process group in specific requirements; see Table B for list of HAPs included in cap.
Spent Acid Process	PCS 0001	0.56	Cap on HAPs for process group in specific requirements; see Table B for list of HAPs included in cap.
Total		9.41*	*Lead Compounds included in HAPs total

	Table B List of HAPs	included in HAP Caps for PCS 00	01 8HG PC2 0002
		Pollutant	
	1 1 2 2-Tetrachloroethane	Captan	Methyl bromide
	1 7 7 7	Carbaryl	Methyl chloride
		Carbon disulfide	Methyl ethyl ketone
	<b>)</b>	Carbon tetrachloride	Methyl isobutyl ketone
	1	Carbonyl sulfide	Methyl methacrylate
•	1	Chlordane	Methylene diphenyl diisocyanate
		Chlorinated dibenzo-p-dioxins	Monomethyl hydrazine
	į <sup>*</sup>	Chlorinated dibenzo furans	N,N-Diethyl aniline
	1 -	Chloroacetic acid	N,N-dimethylbenzenamine
	1 ·	Chlorobenzene	N-Nitroso-N-Methylurea
	' - ' '	Chloroethane	N-Nitrosodimethylamine
·	l ·	Chloroform	N-Nitrosomorpholine
	, , , ,	Chloromethyl methyl ether	Naphthalene (and Methylnaphthalenes)
		Chloroprene	Nitrobenzene
	1,1,2,2-Tetrachloroethane 1,1-Dichloroethane 1,1-Dimethylhydrazine 1,2,4-Trichlorobenzene 1,2-Dibromo-3-chloropropane 1,2-Dichloroethane 1,2-Dichloroethane 1,2-Dichloropropane 1,2-Diphenylhydrazine 1,2-Epoxybutane 1,2-Epoxybutane 1,2-Epoxyethylbenzene 1,2-Oxathiolane 2,2-dioxide 1,3-Butadiene 1,3-Dichloropropene 1,4-Dichlorobenzene 1,4-Dioxane 2,2'-dichlorodiethylether 2,2,4-Trimethylpentane 2,4,5-Trichlorophenol 2,4-G-Trichlorophenol 2,4-Dinitrophenol 2,4-Dinitrophenol 2,4-Toluene diamine 2-Acetylaminofluorene 2,4-Toluene diamine 2-Acetylaminofluorene 2-nitro-Propane 3,3'-Dichlorobenzidine 4,4'-Methylenebis-(2-Chloroaniline) 4,4'-Methylenebisbenzeneamine 4,6 Dinitro-o-cresol 4-Aminodiphenyl 4-Dimethylaminoazobenzene 4-Nitrobiphenyl 4-Nitrophenol Acetaldehyde	Cresol	Parathion
		Cumene	Pentachloronitrobenzene
	·	Diazomethane	Phenol
	I	Dibutyl phthalate	Phosgene
	_ ·	Dichlorvos	Phthalic Anhydride
		Diethanolamine	Polychlorinated biphenyls
	_	Diethyl Sulfate	РАН
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Dimethyl formamide	Propionaldehyde
		Dimethyl phthalate	Propoxur
	- · · · · · · · · · · · · · · · · · · ·	Dimethyl sulfate	Propylene oxide
		Dimethylcarbamoyl chloride	Propylenimine
	•	Epichlorohydrin	Pyrocatechol
	1,1-Dichloroethane 1,1-Dimethylhydrazine 1,2,4-Trichlorobenzene 1,2-Dibromo-3-chloropropane 1,2-Dichloroethane 1,2-Dichloropropane 1,2-Dichloropropane 1,2-Diphenylhydrazine 1,2-Epoxybutane 1,2-Epoxyethylbenzene 1,2-Oxathiolane 2,2-dioxide 1,3-Butadiene 1,3-Dichloropropene 1,4-Dichlorobenzene 1,4-Dioxane 2,2'-dichlorodiethylether 2,2,4-Trimethylpentane 2,4,5-Trichlorophenol 2,4,6-Trichlorophenol 2,4-Dinitrophenol 2,4-Dinitrophenol 2,4-Toluene diamine 2-Acetylaminofluorene 2-nitro-Propane 3,3'-Dichlorobenzidine 4,4'-Methylenebis-(2-Chloroaniline) 4,4'-Methylenebis-(2-Chloroaniline) 4,4'-Methylenebisbenzeneamine 4,6 Dinitro-o-cresol 4-Aminodiphenyl 4-Dimethylaminoazobenzene 4-Nitrobiphenol	Ethyl 4,4'-Dichlorobenzilate	Quinoline
		Ethyl Acrylate	Quinone
İ		Ethyl benzene	Styrene
		Ethylene glycol	Toluene
		Ethylene oxide	Toluene-2,4-diisocyanate
	-	Ethyleneimine	Toxaphene
	<u>-</u> •	Ethylenethiourea	Trichloroethylene
,	-	Formaldehyde	Triethyl amine
		Glycol ethers (Table 51.1)	Trifluralin
	_	Glycol ethers (Table 51.3)	Urethane
	•	Heptachlor	Vinyl acetate

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	Acetonitrile	Hexachlorobenzene	Vinyl bromide
	Acetophenone	Hexachlorobutadiene	Vinyl chloride
	Acrolein	Hexachlorocyclopentadiene	Vinylidene chloride
	Acrylamide	Hexachloroethane	Xylene (mixed isomers)
	Acrylic acid	Hexamethylene diisocyanate	alpha-Chloroacetophenone
	Acrylonitrile	Hexamethylphosphoramide	beta-Propriolactone
	Allyl chloride	Hydrazine	bis(2-ethylhexyl)phthalate
	Amiben	Hydroquinone	bis(Chloromethyl)ether
	Aniline	Iodomethane	n-Hexane
	Benzene	Isophorone	o-Aminoanisole
	Benzidine	Lindane	o-dianisidine
	Benzotrichloride	Maleic anhydride	ortho-Tolidine
	Benzyl chloride	Methanol	ortho-Toluidine
	Biphenyl	Methoxychlor	p,p'-DDE
	Bromoform	Methyl Isocyanate	para-Phenylenediamine
	Butene (mixed isomers)	Methyl Tertiary Butyl Ether	pentachloro-Phenol
Non-	1,1,1-Trichloroethane	Hydrogen cyanide	Tetrachloroethylene
VOC	Calcium cyanamide	Hydrofluoric acid	Titanium tetrachloride
	Cyanide compounds	Phosphine	
	Dichloromethane	Phosphorus, Tótal (as P)	

#### IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a major source of criteria pollutants. The facility is also a major source of Toxic Air Pollutants (TAPs) under LAC 33:III. Chapter 51. The facility is not a major source of Hazardous Air pollutants (HAPs); however, wastewater and wastewater residuals from facilities subject to 40 CFR 63 Subpart G and other MACT standards or NSPS may be treated at the facility. Therefore, the Sulfuric Acid Plant complies with any applicable provisions of these MACT/NSPS standards.

#### **Permit Shield**

Per 40 CFR 70.6(f) and LAC 33:III.507.I, a permit shield has been determined for the referenced facility as follows:

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- 1. Per 40 CFR 60.8(c), emissions in excess of a standard are not in violation during startup, shutdown, or malfunction events. Further, per 40 CFR 60.11(c), the opacity standards do not apply during periods of startup, shutdown, and malfunction. Rhodia's Consent Decree defines startup as, "the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oils, to the furnace commences after a main gas blower shutdown" but there is no such definition in 40 CFR 60 Subpart H. Therefore, Rhodia has requested a permit shield to use the Consent Decree definition of "startup" for determining compliance with the 40 CFR 60 Subpart H 10% opacity limit and the 0.15 lbs/ton limit.
- 2. The Unit No. 1 and Unit No. 2 furnaces are treatment processes for certain waste streams regulated under 40 CFR 61 Subpart FF (Benzene Waste NESHAP). Per 40 CFR 61.348(e) certain requirements apply if the treatment process has any openings (e.g., access doors, hatches, etc.)

The furnaces operate at less than atmospheric pressure which is continuously monitored. Annual inspections per 61.348(e)(3)(ii) are conducted. Frequent inspections and repairs are conducted to minimize any cracks and unsealed openings. Very small openings may go undetected and/or not be repaired because the furnaces operate under vacuum. Occasionally, the furnaces may experience a short-term positive pressure when introducing a new feed to the furnace. This issue was reviewed with LDEQ for the recently issued BIF permit. The BIF permit requires that furnace pressure be maintained at -0.1 inches of water maximum, 10-second delay. The 10-second delay is allowed to normalize the pressure before automatically shutting down feeds to the furnace.

Rhodia requested a permit shield that allows compliance with 61.348(e) to be demonstrated by maintaining furnace pressure at -0.1 inches of water maximum, 10-second delay and operating furnace openings with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h).

3. For the Treatment Services Fugitive Emissions (EIQ FUG-TS), per the Louisiana Fugitive Emissions Program Consolidation Guidelines, Rhodia follows a streamlined fugitive monitoring program with the Louisiana MACT Determination for Non-HON sources as the most stringent program. Rhodia has reduced site-wide permitted emissions of all class I and II TAPs emitted from source FUG-TS to below

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their MERs. Thus, LA Non-HON MACT no longer applies. However, Rhodia is voluntarily choosing to continue to comply with the LA Non-HON MACT since the program is already in place. Therefore, Rhodia is requesting a permit shield to ensure that complying with LA Non-HON MACT still ensures compliance with the underlying programs that were consolidated (40 CFR 264 Subpart BB and 40 CFR 61 Subpart V).

4. Rhodia requested a permit shield stating that compliance with the NSPS Subpart H acid mist and opacity standards constitutes compliance with the LAC 33:III.Chapter 15 acid mist standard and the LAC 33:III.1311.C opacity standard and that compliance with the SO<sub>2</sub> standard in the permit (long-term and short-term limits which are lower than the Subpart H standard of 4.0 lbs/ton) constitutes compliance with the LAC 33:III.Chapter 15 SO<sub>2</sub> standard. "Standard" in this context includes all monitoring, recordkeeping, reporting, and testing. This permit shield is effective upon permit issuance for Unit 2 for all three pollutants and for Unit 1 for acid mist. It becomes effective for Unit 1 SO<sub>2</sub> and opacity when the more stringent standards become effective on May 1, 2012

#### V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

#### VI. Public Notice

Public notice is not required for a minor modification to a Part 70 Operating Permit.

#### VII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by LDEQ to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model

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emissions for this permit modification. However, LDEQ did require modeling for the 0840-00033-V2 permit, which the facility submitted on October 6, 2008. The results are presented below.

Dispersion Model(s) Used: <u>ISCT3</u>

			·
Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Chlorine	8-Hour	18.95 μg/m³	35.7 μg/m³
Hydrochloric acid	8-Hour	$79.75  \mu \text{g/m}^3$	180 μg/m³
Hydrogen Sulfide	8-Hour	264.82 μg/m <sup>3</sup>	330 μg/m <sup>3</sup>
Sulfuric acid	8-Hour	$22.32  \mu \text{g/m}^3$	23.8 $\mu g/m^3$
MIBK	8-Hour	$323  \mu g/m^3$	4880 μg/m <sup>3</sup>
Dichloromethane	Annual	0.86668 μg/m <sup>3</sup>	212.77 μg/m³
Acrylonitrile	Annual	$1.152  \mu g/m^3$	$1.47  \mu g/m^3$
1,3-Butadiene	Annual	$0.723  \mu g/m^3$	$0.92  \mu \text{g/m}^3$
Antimony	8-Hour	$0.46624  \mu \text{g/m}^3$	11.90 μg/m <sup>3</sup>
Arsenic	Annual	$0.00004  \mu \text{g/m}^3$	$0.02  \mu \text{g/m}^3$
Barium	8-Hour	0.88404 μg/m <sup>3</sup>	11.90 μg/m <sup>3</sup>
Chromium VI	Annual	$0.00004  \mu \text{g/m}^3$	0.01 μg/m <sup>3</sup>
Copper	8-Hour	0.40913 μg/m <sup>3</sup>	23.80 μg/m <sup>3</sup>
Manganese	8-Hour	$0.27827 \mu \text{g/m}^3$	4.76 μg/m <sup>3</sup>
Nickel	Annual	0.00004 μg/m <sup>3</sup>	0.21 μg/m <sup>3</sup>
Selenium	8-Hour	0.35001 μg/m <sup>3</sup>	4.76 μg/m <sup>3</sup> <sub>3</sub>
Zinc	8-Hour	0.80561 μg/m <sup>3</sup>	119.00 μg/m³
SO <sub>2</sub> *	Annual	$21.88  \mu g/m^3$	(80 μg/m³)
*Phase I emissions	24-Hour	335.04 μg/m <sup>3</sup>	$(365  \mu g/m^3)$
(worst case)	3-Hour	1017.57 μg/m³	$(1300  \mu g/m^3)$

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#### VIII. General Condition XVII Activities

				Emissio	n Rates	– tons		
ID No.	Work Activity	Schedule	$PM_{10}$	$SO_2$	$NO_X$	CO	VOC	Other
GC1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 12 months per unit	0.2					
GC2	Drum re-packaging	4 times per year					0.002	
GC3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly		0.06			0.06	
GC4	Tank and process equipment cleaning		·	0.1			0.90	
GC5	Opening of truck and railcars containing waste fuel and spent acid for sampling, inspection, maintenance, or further processing	Daily		0.5			0.1	
GC6	Sampling waste fuel trucks, railcars, and tanks via sample tap	10 times per day					0.03	##
GC7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day	•	0.004			0.004	1
GC9	Odor-neutralizing compounds			-			0.06	
GC10	Manual gauging of tank levels		101-101-1	0.5			0.1	
GC11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (formerly EIQ 18)			<0.001				<0.001#
GC12	Sampling for moisture content, stack gauging, and pressure readings from gas streams	,	0.1*	0.1				0.1*
GC13	Loading fresh acid onto heel of spent acid			0.003			0.004	
GC14	Maintenance that requires shutdown or bypass of Acid Plant Vapor Combustor (APVC)	240 hours per year (max)					4.62	**
GC15	Unloading containers of spent acid with chlorinated VOCs (carbon bed for VOCs, caustic scrubber if any SO2 present)	1 per week		0.1			0.06	**

<sup>\*</sup>Sulfuric Acid Mist

<sup>#</sup>Hydrogen Sulfide
\*\*\* VOC Speciation similar to Spent Acid Process permitted emissions
## VOC Speciation similar to TS Process permitted emissions

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#### IX. Insignificant Activities

ID No.	Description	Operating Rate (Max) or Tank Capacity	Regulation
20D962	Diesel Storage Tank, Firewater Pump	300 gal	LAC 33:III.501.B.5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gal	LAC 33:III.501.B.5.A.3
•	Diesel Storage Tank, IFS	1000 gal	LAC 33:III.501.B.5.A.3
91D321	IFS Wash-water Storage Tank	9000 gal	LAC 33:III.501.B.5.A.3
90D210	Laboratory Excess Sample Tank	100 gal	LAC 33:III.501.B.5.A.2
Hoods	Different Analyses*	N/A	LAC 33:III.501.B.5.A.6
2200	Drum Washing Operations	55 gal	LAC 33:III.501.B.5.A.7
•	Temporary (seasonal) Portable Gasoline Tank	550 gals	LAC 33:III.501.B5.A.8

<sup>\*</sup>Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environmental monitoring purposes.

<b>X.</b> 7	Table 1. Applicable Louisiana	and I	Fede	ral A	Air (	Qual	ity Re	quire	ments		WK	· · · · · · · · · · · · · · · · · · ·		4778		*		-		<del>a</del>
ID	ID Description				LAC 33:III.Chapter										<u></u>					
No.:	No.: Description		9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
UNF002	Facility Wide	1	1	1	1		<u> </u>				<del>                                     </del>	1	<del> </del>	<del>                                     </del>	<del> </del>	<del>                                     </del>	<del> </del>	1	1 1	+
ARE002	M4 – West End Sump					·											<del></del>		<del>  -                                   </del>	<del> </del>
ARE003	M3 - Treatment Services Sumps																		<del> </del>	+
EQT008	30D260 - Spent Acid Tank			T				2							<del> </del>				<u> </u>	<del> </del>
EQT140	10 - Preheater; Acid Unit No. 1			1	I	2						<del>                                     </del>			1					<del> </del>
EQT141	11 – Lime Silos		1		1	T						<del> </del>							<del> </del>	<del> </del>
EQT142	12 - Oleum Loading Vent Scrubber	1			<u> </u>								i					1		<del> </del>
EQT146	20 - Sulfur Feed Tank		<b></b>			2										<u> </u>		1		+
EQT147	21 - TS Vapor Combustor			1	1	2		1							<del></del>	<del>                                     </del>	<del></del>	i	<del> </del>	+
EQT149	24 - Oleum Barge Loading Scrubber	1	ļ.	<del>  -</del>	<del></del>			<u> </u>	-			ļ .				<del></del>		1		<del> </del>
EQT150	26 - Spent Acid Barge Loading Scrubber	1								3			2							<del> </del>
EQT151	27 - Acid Plant Vapor Combustor			1	1	2	<u> </u>	2				<del></del>	·				ļ. <b></b> .	1	<del></del>	<del> </del>
EQT152	28 - Gasoline Storage Tank		1	<del> </del>		<del> </del> -		1										<u>.</u>	<del>                                     </del>	<del> </del>
EQT153	6-90 - Package Boiler		<del> </del>	1	1	2	<del> </del>				<del> </del>					ļ				<del> </del>
EQT154	Mla - Unit 2 Cooling Tower		<del> </del>		2	<del> </del>					· ·		<del> </del>				<u></u>		<del>                                     </del>	<del> </del>
EQT155	M1b - Unit 1 Cooling Tower		1		2						-	-						<u> </u>	<del> </del>	<del> </del>
EQT285	20D380 - Unit 2 Weak Acid Tank	<del></del>	+	<del> </del>		_									<del> </del>				ļ	<del> </del>
EQT157	30D030 - Oleum Tank		+	İ						•			-						ļ <u></u>	<del> </del>
EQT158	30D040 - 93/Oleum		<del> </del>	<u> </u>		_							<del>                                     </del>		<del> </del>					<del> </del>
EQT159	30D050 - 99WW Tank		+	1									<del>                                     </del>			<del></del>	ļ			<del> </del>
EQT161	30D070 - Spent Acid Tank		<del> </del>			ļ		2				<del> </del>				<u> </u>	<del></del>		1	<del> </del>
EQT163	30D100 - Spent Acid Tank	<del>                                     </del>	╁				_	2			<del>                                     </del>				<del> </del>					<del> </del>
EQT164	30D110 - Spent Acid Tank		<del>                                     </del>	1				2				<del> </del>				<b></b>				+-
EQT165	30D120 - Spent Acid Tank	<del></del>	1	<del> </del>	-			2			<del> </del>	-			-	-				+
EQT166	30D130 – Oleum Tank	<del>\                                    </del>	<del> </del>	+	<del> </del>		<del> </del>	<del></del> -		<u>-</u>	<del> </del>	-	<del> </del>		1-			-	<del> </del>	
EQT167	30D140 – 99/Oleum/Spent	-		<del> </del>			-	2	<del>                                     </del>		<del> </del>				<del>                                     </del>		<del> </del>		<del> </del>	-
EQT168	30D150 – 99/Oleum Spent	+	1	+	<del>                                     </del>	<del> </del>	<del> </del>	2	<del> </del>		<del> </del>						<del></del>	<u> </u>		<del> </del>
EQT169	30D160 – Spent Acid Tank		+-	<del> </del>		<del> </del>	<del> </del>	2				<del> </del>			<u> </u>				<b></b>	┼
EQT170	30D180 – 93E Tank	+	+-			<del>                                     </del>	<del> </del>		<del></del>		<b> </b>	<del> </del>			-					-

Х.	Table 1. Applicable Louisiana :	and I	Fede	ral A	ir (	Qual	ity Re	quire	ments						-	<del></del>				<del></del>
ID	Description									LA	C 33:	III.Ch	apter							
No.:		5*	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT171	30D190 - Spent Acid Tank		İ		· · · · ·			2	<del> </del>		<del> </del>		<del> </del>	<u>'</u>	-	<u>                                       </u>	<u> </u>	<u> </u>	<del> </del>	+
EQT173	30D210 93E Tank									<u> </u>						<b> </b>	<del> </del>			<del></del>
EQT174	30D220 - 99WW Tank							<u> </u>	·			<b> </b>	<del> </del>				<del> </del>			+
EQT175	30D230 - 99C Tank							<del></del>	<u> </u>			<del> </del>	<del> </del>					-		+
EQT176	20D120/30D240 - IFS Mix Tank			†				1				<del> </del>	<del> </del>		ļ			<del> </del>		
EQT177	40D250 - Treatment Services Tank						<del> </del>	1		<u> </u>		<del> </del>					<b></b>			
EQT178	40D280 - Treatment Services Tank	<u> </u>	T i					<del>- 1</del>				<del> </del>	-					1	<del> </del>	+
EQT179	40D290 - Treatment Services Tank	<del>                                     </del>	† <del></del>	<del>                                     </del>				1		<b></b>		<del> </del>				· · · · · · · · · · · · · · · · · · ·			<del> </del>	<del> </del>
EOT180	40D200 - Treatment Services Tank	<del>                                     </del>	<del>  </del>	<del>                                     </del>		· -		1 1				<del> </del>	-						<del>                                     </del>	+
EQT181	40D210 - Treatment Services Tank	<del> </del>		<del>                                     </del>		-		1 1	<del> </del>			<del>                                       </del>	-							-
EQT182	40D300 - Treatment Services Tank	-		<del> </del>				1		-		<del> </del>		<u> </u>						<del> </del>
EQT183	40D220 - Treatment Services Tank	<del> </del>	<del>                                     </del>	1				1 1				<del> </del>	<del> </del>				ļ		·	<del>}</del> -
EQT184	30D103 - Sulfur Unloading Tank	╁	<del>                                     </del>	-		<del></del>	<del> </del>	<del>                                     </del>	<del></del>			<b></b>				<u> </u>	<u> </u>			<del> </del>
EQT185	M7 - 001 Wastewater Treatment Unit	$\vdash$	<del>                                     </del>				<u> </u>	<del> </del>				<u> </u>			<del> </del>	-	ļ		<del> </del>	+
EQT186	1-06 - Rental Boiler	1		+	1	2	<del> </del>	<u> </u>			<b></b>	-	<del> </del>		<del>                                     </del>		<u> </u>		ļ	
FUG002	FUG-ACID – Acid Plant Fugitive Emissions					2			1						3			1		
FUG003	FUG-TS - Treatment Services Fugitive Emissions				-							<u> </u>			3			1		
GRP002	SAU - Sulfuric Acid Units 1 & 2	1						<u> </u>				<del> </del>	<del> </del>				<del>                                     </del>		<del> </del>	<del> </del>
GRP021	Comb - Combustion (Unit 1, Unit 2, Rental Boiler)	1																		<b>†</b>
RLP013	2 - Sulfuric Acid Unit No. 2	1		1	1	1						<del> </del>	<del> </del>			-	<del> </del>	1		<del></del>
RLP014	3 - Sulfuric Acid Unit No. 1	1	1	$\vdash$	1	1		1	<del>                                     </del>		1	1	<del> </del>	1		<u> </u>	<del> </del>	1 1	<del> </del>	<del></del>
PCS001	Spt-Proc - Spent Acid Process		1	1	<u> </u>	1		<del>                                     </del>			<u> </u>	<del>                                     </del>	<del> </del>	<del> </del>	†	<del>                                     </del>	<del> </del>	1	<del></del>	+
PCS002	TS-Proc - TS Process		1	1	<b> </b>			<del> </del>	-	<del>                                     </del>	-	<del>                                     </del>		<del> </del>	+	<del> </del>	<del>                                     </del>	1		
EQT277	13 - Acid Plant Caustic Scrubber	1	1	1		1	<del> </del>			<del> </del>	-	<del> </del>	<del> </del>		<del> </del>	<del> </del>	<del> </del>	1 -	-	+
EQT278	U1-Scbr - Unit 1 Tail Gas Scrubber	1	1	1		† <u> </u>	1	<b></b>			<del> </del>		<del> </del>	+	<del> </del>	<del> </del>	<del> </del>	<del> </del>		+
EQT279	U2-Scbr – Unit 2 Tail Gas Scrubber	1	1	<del> </del>	1	<b>†</b>	<del></del>	1		1		<del> </del>		<del> </del>	1	<del>                                     </del>	<del>                                      </del>	ļ		+
EQT280	U1-Furn – Unit 1 Furnace	†		1		<del>                                     </del>	1	2	<del> </del>	1		<del> </del>	<del> </del>		<del>                                     </del>	<del> </del>	<del> </del>	1		+
EOT281	U2-RFum – Unit 2 Regen Furnace	1	1	<del>† i</del>	<b>!</b>	1		<del>  ~~</del>	<del> </del>		<del> </del>	<del> </del>	-			+	1	ı ı	<del> </del>	+

#### Rhodia Inc

Agency Interest No.: 1314

Rhodia Inc

Baton Rouge, East Baton Rouge Parish, Louisiana

X. 7	Table 1. Applicable Louisian:	and l	Fede	ral A	Air (	Qual	lity Re	quire	ments											
ID	<u></u>									LA	AC 33:	III.Ch	apter			•	-			
No.: Description	Description	5	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT282	U2-SFurn - Unit 2 Sulfur Furnace		*****	1	<u> </u>	1							AJ-PA-L-L-A	1					$\vdash$	<b>†</b>
EQT283	U1-Proc - Unit 1 Process			1		1														1
EQT284	U2-Proc – Unit 2 Process					i												1	1	
EQT291	M10 - Diesel Fire-water Pump			1	1										İ					1

<sup>\*</sup> The regulations indicated above are State Only regulations.

#### KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
  - -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank The regulations clearly do not apply to this type of emission source.

All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

X.	Table 1. Applicable Louisia	na	and	Fe	dera	l A	ir (	Qual	ity l	Req	uire	me	nts					<del></del>			<u>,</u>								
ID No.:	Description		· - · ·		CFR						CFR								R 63					0 CF 65			40 CFI	.2	40 CFR 264
1 D 10000		A	Cd	Db	<u>H</u>	K	Ka	Kb	A	J	M	V	FF	A		EEE	F	G*	GGG*	Q	XX*	ZZZZ	Α	C	G	64	68	82	BB
UNF002	Facility Wide	1	L						1	ļ	1		1	1	3			1	1		1						1	1	
ARE002	M4 – West End Sump	ļ																											
ARE003	M3 - Treatment Services Sumps	<u> </u>							ļ	ļ																			
EQT008	30D260 - Spent Acid Tank					Ш		1	,							<u> </u>								1	1				
EQT140	10 - Preheater; Acid Unit No. 1																												
EQT141	11 – Lime Silos					<u> </u>																							
EQT142	12 - Oleum Loading Vent Scrubber								L											П									
EQT146	20 - Sulfur Feed Tank																					1		-					
EQT147	21 - TS Vapor Combustor							1					1				1.1	1		1									
EQT149	24 - Oleum Barge Loading Scrubber														-		$\Box$			$\top$		1	_		<u> </u>				
EQT150	26 – Spent Acid Barge Loading Scrubber																								-				
EQT151	27 - Acid Plant Vapor Combustor																			┢		<u> </u>	1		1				
EQT152	28 – Gasoline Storage Tank							3				<del>                                     </del>		•			1			+	<del> </del>	<del>                                     </del>	┼┷┤		÷				
EQT153	6-90 - Package Boiler			1							· .								l	$\vdash$			-						
EQT154	M1a - Unit 2 Cooling Tower					1	$\vdash$		1	1									<b></b>	3					-	<del> </del>		<del> </del>	
EQT155	M1b - Unit 1 Cooling Tower		-						1	· · · · ·					_		+			3			<u> </u>					<del>  </del>	<b>_</b>
EQT285	20D380 - Unit 2 Weak Acid Tank	· ·				3	3	3	1		<b></b>								-	+~			$\vdash$		<del> </del>	<del> </del>	<del></del> -	<del>  </del>	<u> </u>
EQT157	30D030 - Oleum Tank	<del> </del>				3	3	3	1	$\vdash$	1					<del> </del>	<del>                                     </del>			+		-	-		<del>                                     </del>			<del>  </del>	
EQT158	30D040 - 93/Oleum	<b></b>				3	3	3	$\top$	<del>                                     </del>	1						-			+		<del> </del>	-		<u> </u>			<del> </del>	
EQT159	30D050 - 99WW Tank		1			3	3	3	1					$\overline{}$		1	1			+		<del>                                     </del>	$\vdash$			<del>                                     </del>		╂──┦	
EQT161	30D070 - Spent Acid Tank					3	3	1	1	+	<b> </b>					-	<del>  </del>			╁╌		<del>                                     </del>	-	1	ī	<del>                                     </del>		+	
EQT163	30D100 - Spent Acid Tank					3	3	1	1-	1						<b> </b>				╁	<b>.</b>	<del> </del>	-	1	i	-		<del> </del>	
EQT164	30D110 - Spent Acid Tank					3	3	1	-	†	t	1	1-	_	<b></b> -	<u> </u>	+	-		+	· · · · · ·	<del> </del>		1	1	<del> </del>	<del></del>		<u> </u>
EQT165	30D120 - Spent Acid Tank	<del> </del>	<del>                                     </del>			3	3	i	<del>                                     </del>	1	<b>i</b>	1				·····	+	-			$\vdash$	<del> </del>		<del>-</del>	1	╁		┼──┤	
EQT166	30D130 - Oleum Tank				_	3	3	3	1	<del>                                     </del>	1		1			<del> </del>	-			+	<del> </del>	<del> </del>	-	-	+			<del></del> '	<del></del>
EQT167	30D140 - 99/Oleum/Spent		†			3	3	<del>l ī</del>	†	<del>                                     </del>	+	<del> </del>	<del>                                     </del>		-	<del> </del>				+		<del> </del>	$\vdash$	1	1	<b>}</b> -	<del> </del>	+-	<del> </del>
EQT168	30D150 - 99/Oleum Spent	$\vdash$		<u> </u>		3	3	1	<del>                                     </del>	+	<del> </del>	$\vdash$			<u> </u>	1	1			+	<del>                                     </del>	<del> </del>	$\vdash$	1	1	$\vdash$	<u> </u>	<del>  </del>	<del> </del>
EQT169	30D160 - Spent Acid Tank	1		$\vdash$		3	3	† <del>i</del>	+	+	<del> </del>	1		_		<del>                                     </del>	<del>  </del>			+	<b> </b> -	<del> </del>	+-	+	<del>                                     </del>	├──		1	<u> </u>
EQT170	30D180 - 93E Tank	<del>                                     </del>				3	3	3	+	+	1	╁				<b></b>	+		<del>                                     </del>	+	-	<del> </del>	┼	<del>'</del>	1	-		┼──	<del></del>
EQT171	30D190 - Spent Acid Tank	†	<b></b>			3	3	ΙŤ	<del> </del>	+-	$\vdash$	<del> </del>	-	<del>  -</del>		-	+-		<del> </del>	+	-	<del> </del>	┼	1	1	<del>                                     </del>		<del> </del>	<del> </del>
-4111	pobio Spont Acid Tank		ــــــــــــــــــــــــــــــــــــــ	<u> </u>	l	ر اا	1 2	<u> </u>			<u></u>		<u> </u>	L	<u> </u>	<u> </u>			<u> </u>	1	<u> </u>		<u> </u>	l l	1 1		<u> </u>	<u> </u>	

Χ.	Table 1. Applicable Louisia	na	and	l Fe	dera	i A	ir (	Qual	ity ]	Req	uire	me	nts																
ID No.:	Description			40	CFR	60		-		. 40	CFR	61					4(	) CF	R 63				4	0 CF 65			40 CF	R	40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	Α	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	C	G	64	68	82	BB
EQT173	30D210 - 93E Tank					3	3	3	T .																	<u> </u>		1	
EQT174	30D220 - 99WW Tank					3	3	3	1.		ļ	1	T	· · · · ·					· · · · · · · · · · · · · · · · · · ·				<u> </u>				i	<u> </u>	· .
EQT175	30D230 - 99C Tank					3	3	3		Ì													1.	-				·	
EQT176	20D120/30D240 - IFS Mix Tank					i		3					T										1					<del> </del>	
EQT177	40D250 - Treatment Services Tank					3	3	1				·	1	ļ			. 1	1					1				<u> </u>	<u> </u>	
EQT178	40D280 - Treatment Services Tank					3	3	1				Ī-	1	ļ				1											
EQT179	40D290 - Treatment Services Tank					3	3	3					i	ļ				1					1						
EQT180	40D200 - Treatment Services Tank					3	3	1	İ	· ·			1	<b> </b>				1								-			
EQT181	40D210 - Treatment Services Tank					3	3	3					1	ļ				1					1						<b>-</b>
EQT182	40D300 - Treatment Services Tank					3	3	3				1	1					1			-					1		<u> </u>	
EQT183	40D220 - Treatment Services Tank					3	3	3				i .	1					1								· · · · · ·		<b></b>	
EQT184	30D103 – Sulfur Unloading Tank									·		T		T														<u> </u>	
EQT185	M7 – 001 Wastewater Treatment Unit							3																					
EQT186	I-06 – Rental Boiler	<u> </u>		1						<del>                                     </del>	i	i										·				<u> </u>			
FUG002	FUG-ACID – Acid Plant Fugitive Emissions											Ì									i				1				
FUG003	FUG-TS – Treatment Services Fugitive Emissions							1		1		1	1					1											1
GRP002	SAU - Sulfuric Acid Units 1 & 2	<u> </u>				i						1		i															
GRP021	Comb - Combustion (Unit 1, Unit 2, Rental Boiler)				-				٠.						·														
RLP013	2 - Sulfuric Acid Unit No. 2	1	1		1#				· · · ·			İ				3										1		<u> </u>	
RLP014	3 - Sulfuric Acid Unit No. 1	1	1		1#								T			3			i				1			Ιī	· · ·		
PCS001	Spt-Proc - Spent Acid Process													<del>                                     </del>											ļ	<del>  •</del>			
PCS002	TS-Proc - TS Process											li		<b></b>												<del>                                     </del>			
EQT277	13 - Acid Plant Caustic Scrubber							1				П	<del>                                     </del>	†									†						
EQT278	U1-Scbr - Unit 1 Tail Gas Scrubber		<u> </u>									П		<b> </b>							<u> </u>	· · · · ·				-			
EQT279	U2-Scbr - Unit 2 Tail Gas Scrubber								Ī	T		li -		1															
EQT280	U1-Furn – Unit 1 Furnace			-								1	1					1	-			· · · · ·	†		ī				
EQT281	U2-RFurn - Unit 2 Regen Furnace	<u> </u>			-	ľ		1		<b></b>		li —	1	1				1	-				†		<del>                                     </del>	┼	-	<del>  -</del>	
EQT282	U2-SFurn - Unit 2 Sulfur Furnace								1			ii		1				_	i				ļ			1			
	<del>*************************************</del>		*****	· · · · · · · · · · · · · · · · · · ·				•	<u>.                                      </u>		<del></del>		<del>'</del>		***************************************	-	ياحسنا				<del></del>	·				<del></del> -			1

#### Rhodia Inc Agency Interest No.: 1314 Rhodia Inc Baton Rouge, East Baton Rouge Parish, Louisiana

X.	Table 1. Applicable Louis	iana	and	l Fe	lera	l A	ir (	Qual	ity ]	Req	uire	eme	nts	<del></del>			<del></del>									<del>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</del>			
ID No.:	No.: Description	·		40	CFR	60				40	CFR	61					40	) CF	'R 63				4	10 CF 65	₹R		40 CF	3	40 CFR 264
<u></u>		Α	Cd	Db	H	K	Ka	Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	0	XX*	ZZZZ	A	C	G	64	68	82	BB
EQT283	UI-Proc - Unit 1 Process																十首						<del>                                     </del>		<del>                                     </del>		-		
EQT284	U2-Proc - Unit 2 Process											· · · · · · ·	1.		-		1			1			$\vdash$		<del> </del>				
EQT291	M10 – Diesel Fire-water Pump																					1						<b></b>	

#### KEY TO MATRIX

-The regulations have applicable requirements that apply to this particular emission source.

-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

-The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

-The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this

particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

ID No:		ption Status or Non-Applicability of a S  Requirement	Notes
UNF002 Facility Wide		bpart DD – National Emission Standards for Pollutants from Off-Site Waste and Recovery Operations 40 CFR 63.680(a)	DOES NOT APPLY – Facility is a minor source of emissions of HAPs.
EQT140, 146, 147, 151, 153, 186, and FUG002 (10, 20, 21, 27, 6-90, 1-06, and FUG-ACID)	Emi	ssion Standards for Sulfur Dioxide LAC 33:III.1503	EXEMPT - units emit less than 250 TPY of sulfur compounds measured as SO <sub>2</sub> .  LAC 33:III.1503.C
EQT150	Control of Emis	sions of Organic Compounds – Marine Vapor Recovery LAC 33:III. 2108	DOES NOT APPLY – Uncontrolled emissions are less than 100 tpy of VOCs. LAC 33:III.2108.A
26 – Spent Acid Barge Loading Scrubber	Control of Em	issions of Organic Compounds — Waste Gas Disposal LAC 33:III.2115	EXEMPT – Waste gas stream has a combined weight of VOCs equal to or less than 100 pounds in any continuous 24 hour period. LAC 33:III.2115.H.1.c
EQT 151 27 – Acid Plant Vapor Combustor	Control	of Emission of Organic Compounds LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQT152 28 – Gasoline Storage Tank	•	Kb – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110b	DOES NOT APPLY – Storage capacity is less than 73 m 40 CFR 60.110b

XI. TABLE 2. Expla	nation for Exemption Status or Non-Applicability of a So	ource ·
ID No:	Requirement	Notes
EQT154 and 155 M1a and M1b	Emission Standards for Particulate Matter  LAC 33:III.1311.C	EXEMPT – LDEQ has granted an exemption from the opacity standards of LAC 33:III.1311.C as the particulate matter emissions are well below the process rate limitation. LAC 33:III.1311.E
Cooling Towers	40 CFR 63 Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers 40 CFR 63.400	DOES NOT APPLY – The Baton Rouge site does not use chromium-based water treatment chemicals. 40 CFR 63.400(a)
EQT008 Spent Sulfuric Acid Storage Tank	Control of Emission of Organic Compounds  LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQTs 161, 163-165, 167- 169, 171 Spent Acid Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978  40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Control of Emission of Organic Compounds  LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.

XI. TABLE 2. Expla	nation for Exem	ption Status or Non-Applicability of a So	ource
ID No:		Requirement	Notes
EQT176 20D120/30D340 – IFS Mix Tank	Volatile Organic for Which Co	art Kb – Standards of Performance for Storage Liquid Storage Vessels for Petroleum Liquids instruction, Reconstruction, or Modification commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY – This tank is grater than 75 m <sup>3</sup> and less than 151 m <sup>3</sup> storing a liquid with a maximum true vapor pressure less than 15.0 kPa. 40 CFR 60.110b(b)
CRG001 (EQTs 177, 178, 180) Tanks	Vessels for P Reconstruction,	art K – Standards of Performance for Storage etroleum Liquids for Which Construction, or Modification Commenced After June 11, 973 and Prior to May 19, 1978  40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Vessels for P Reconstruction,	art Ka – Standards of Performance for Storage etroleum Liquids for Which Construction, or Modification Commenced After May 18, 978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	LAC 33:III.2103	.B – Storage of Volatile Organic Compounds	EXEMPT – Tanks at the Baton Rouge Rhodia, Inc. facility used for the storage of corrosive materials are not required to meet the submerged fill pipe provisions of subsections A and B of LAC 33:III.2103 per LAC 33:III.2103.G.7.
EQTs 179, 181-183 Tanks	Vessels for P Reconstruction,	art K – Standards of Performance for Storage etroleum Liquids for Which Construction, or Modification Commenced After June 11, 973 and Prior to May 19, 1978	DOES NOT APPLY – These tanks do not store petroleum liquids.
		40 CFR 60.110	

XI. TABLE 2. Expla	nation for Exem	ption Status or Non-Applicability of a Sc	ource
ID No:		Requirement	Notes
EQTs 179, 181-183 Tanks (cont'd)	Vessels for P Reconstruction	art Ka – Standards of Performance for Storage Petroleum Liquids for Which Construction, or Modification Commenced After May 18, 978 and Prior to July 23, 1984  40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Volatile Organic for Which Co	art Kb – Standards of Performance for Storage Liquid Storage Vessels for Petroleum Liquids Instruction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY – These vessels have a capacity less than 75 m <sup>3</sup> . 40 CFR 60.110(b)(a)
EQT157 – 159, 162, 166, 170, 173 -175, 285 Tanks	Vessels for I Reconstruction	40 CFR 60.110(b)  part K – Standards of Performance for Storage Petroleum Liquids for Which Construction, , or Modification Commenced After June 11, 973 and Prior to May 19, 1978  40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Vessels for I Reconstruction	Part Ka – Standards of Performance for Storage Petroleum Liquids for Which Construction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984  40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Volatile Organic for Which Co	eart Kb — Standards of Performance for Storage Liquid Storage Vessels for Petroleum Liquids Instruction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110(b)	DOES NOT APPLY - These tanks do not store VOLs.

XI. TABLE 2. Expl	anation for Exemption Status or Non-Applicability of a S	ource
ID No:	Requirement	Notes
EQT280 Unit 1 Furnace	Control of Emission of Organic Compounds  LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
FUG002	Fugitive Emission Control for Ozone Nonattainment Areas  LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCMI facility per LAC 33:III.Chapter 21.Appendix A.
FUG-ACID	Emission Control and Reduction Requirements and Standards  LAC 33:III.5109.A	DOES NOT APPLY – This source does not emit any class I or class II TAPs for which site-wide permitted emissions are over the MER. LAC 33:III.5109.A
FUG003 FUG-TS	Fugitive Emission Control for Ozone Nonattainment Areas  LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCMI facility per LAC 33:III.Chapter 21.Appendix A.
RLP013	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCMI for Process Vents, Storage Vessels, Transfer Operations, and Wastewater  40 CFR 63.138)h)(2)(i)	
Sulfuric Acid Unit 2	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
	Emission Standards for Sulfur Dioxide  LAC 33:III Chapter 15	EXEMPT – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.

# Rhodia Inc Agency Interest No.: 1314 Rhodia Inc Baton Rouge, East Baton Rouge Parish, Louisiana

XI. TABLE 2. Expla	anation for Exem	ption Status or Non-Applicability of a So	ource
ID No:		Requirement	Notes
RLP014 Sulfuric Acid Unit 1	Hazardous Air F	rt G – National Emission Standards for Organic Pollutants From the SOCMI for Process Vents, sels, Transfer Operations, and Wastewater 40 CFR 63.138)h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements.  40 CFR 63.138(h)
		opart EEE – National Emission Standards for Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
-	Emission Standar LAC 33:III Chapt	ds for Sulfur Dioxide er 15	EXEMPT starting on May 1, 2012 – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

#### Rhodia Inc Agency Interest No.: 1314 Rhodia Inc Baton Rouge, East Baton Rouge Parish, Louisiana

Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.

- a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (LA MACT Determination for non-HON Facility Equipment Leaks) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.
- b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Sulfuric Acid Plant	LAC 33:III.Chapter 51, LA MACT Determination for non-HON Equipment Leaks	≥ 5% VOTAP	LA MACT Determination for non-HON Equipment Leaks
	40 CFR 61 Subpart V, National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	≥5% VOHAP	*,
	40 CFR 264 Subpart BB, RCRA Subpart BB	≥ 10% Organic	

#### **General Information**

Al ID: 1314 Rhodia Inc

Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

Also	Known	As:

ID ·	Name	User Group	Start Date
2203300033	AFS (EPA Air Facility System)	AFS (EPA Air Facility System)	01-01-2000
0840-00033	CDS Number	CDS Number	08-05-2002
8215111	EPA EIS Facility Site ID	EPA EIS Facility Site ID	01-01-2008
LAD008161234	Rhodia Inc	Hazardous Waste Notification	11-17-1980
PMT/PC	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
00861	Rhone Ponienc Basic Chemical Co	Inactive & Abandoned Sites	11-23-1999
LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites	11-23-1999
LA0005223	LPDES#	LPDES Permit #	05-22-2003
	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
GL-349	Radiation General License	Radiation License Number	12-14-2000
LA-338A-N01	Radioactive Material License	Radiation License Number	12-14-2000
1000021558	Rhodia, Inc., Baton Rouge Facility	Risk Management Plan EPA ID	01-01-2001
G-033-3198	Site ID #	Solid Waste Facility No.	11-21-1999
22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge	01-07-2002
38329	Stauffer Chemical	TEMPO Merge	11-19-2001
38427	Rhodia Inc	TEMPO Merge	01-11-2001
70821STFFRAIRLI	TRI#	Toxic Release Inventory	07-19-2004
WQC 120601-01	Water Quality Certification #	Water Certification	06-04-2012
1275 Airline Hwy Baton Rouge, LA 70805		Main	FAX: 2253593722

Physical Location:

Main Phone: 2253593481

Mailing Address:

1275 Airline Hwy Baton Rouge, LA 70805

Location of Front Gate:

30.508417 latitude, -91.187938 longitude, Coordinate Method: Lat.\Long - Decimal Degrees, Coordinate Datum: NAD83

Related People:

Name	Mailing Address	Phone (Type)	Relationship
S. B. "Bala" Balachandran	1275 Airline Hwy Baton Rouge, LA 70805	2253593443 (WF)	Accident Prevention Contact for
S. B. "Bala" Balachandran	1275 Airline Hwy Baton Rouge, LA 70805	2253593742 (WP)	Accident Prevention Contact for
ricia DeLatin	1275 Airline Hwy Baton Rouge, LA 70821	2253593410 (WP)	Radiation Contact For
Fricia DeLatin	1275 Airline Hwy Baton Rouge, LA 70821	2253593410 (WP)	Radiation License Billing Party for
ricia DeLatin	1275 Airline Hwy Baton Rouge, LA 70821	2253593410 (WP)	Water Billing Party for
Fricia DeLatin	1275 Airline Hwy Baton Rouge, LA 70821	2253593410 (WP)	Haz. Waste Billing Party for
John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	JOHN.RICHARDSOI	Air Permit Contact For
John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	2253593768 (WP)	Air Permit Contact For

#### **General Information**

#### Al ID: 1314 Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5

Air - Title V Regular Permit Minor Mod

Related People:	Name	Malling Address	Phone (Type)	Relationship
•	John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	JOHN.RICHARDSOI	Accident Prevention Billing Party for
	John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	2253593768 (WP)	Accident Prevention Billing Party for
	John Richardson 1275 Airline Hwy Baton Rouge, LA 70805 JOH		JOHN.RICHARDSOI	Emission Inventory Facility Contact for
	John Richardson	1275 Airline Hwy Baton Rouge, LA 70805	2253593768 (WP)	Emission Inventory Facility Contact for
	Daniel Tate	1275 Airline Hwy Baton Rouge, LA 70805		Responsible Official for
	Daniel Tate	1275 Airline Hwy Baton Rouge, LA 70805	2253567111 (WP)	Responsible Official for
Related Organizations:	Name	Address	Phone (Type)	Relationship
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Air Billing Party for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Operates
	Rhodia Inc Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805 c/o CT Corporation System Baton Rouge, LA 70808	225-359-3768 (WP)	Operates Agent of Service for
			225-359-3768 (WP) 225-359-3768 (WP)	·

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

#### Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Spent Acid	i Process	_				
	M4 - West End Sump			55 gallons/mo	55 gallons/mo oil skimmed from sump	8760 hr/yr
CQ1 0008	30D260 - Spent Sulfuric Acid Storage Tank	950000 gallons				8760 hr/yr
QT 0150	26 - Spent Acid Barge Loading Scrubber		800 gallons/min	28.4 MM gallons/yr		1664 hr/yr
	27 - Acid Plant Vapor Combustor		11.5 MM BTU/hr	11.5 MM BTU/hr	Includes Natural Gas and Waste Vent Gas	8760 hr/yr
QT 0161	30D070 - Spent Acid Tank	125655 gallons		***	7011. Ods	8760 hr/yr
	30D100 - Spent Acid Tank	227869 gallons				8760 hr/yr
QT 0164	30D110 - Spent Acid Tank	227869 gallons				
	30D120 - Spent Acid Tank	227869 gallons				8760 hr/yr
QT 0167	30D140 - 99/Oleum/Spent	331612 gallons		-		8760 hr/yr
	30D150 - 99/Oleum/Spent	285198 gallons				8760 hr/yr
QT 0169	30D160 - Spent Acid Tank	285900 gallons				8760 hr/yr
QT 0171	30D190 - Spent Acid Tank	285318 gallons				8760 hr/yr
QT 0176	20D120/30D240 - IFS Mix Tank	25000 gallons			<u> </u>	8760 hr/yr
	M7 - 001 Wastewater Treatment Unit	Lucoo ganona		220000		8760 hr/yr
	13 - Acid Plant Caustic Scrubber			330000 gallons/day		8760 hr/yr
	FUG-ACID - Acid Plant Fugitive Emissions			315 gallons/min	The control device is a scrubber (99% eff. SO2). Works in series with EIQ 151.	2190 hr/yr
00 000E	1 00-7010 - Add Clark rughtive Emissions					8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

#### Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
TS Proces	· · · · · · · · · · · · · · · · · · ·					
ARE 0003	M3 - Treatment Services Sumps			2500 gallons/day		8760 hr/yr
EQT 0147	21 - TS Vapor Combustor		11.6 MM BTU/hr	11.6 MM BTU/hr	Includes Natural Gas and Waste Vent Gas	8760 hr/yr
EQT 0177	40D250 - Treatment Services Tank	157000 gallons				8760 hr/yr
EQT 0178	40D280 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0179	40D290 - Treatment Services Tank	12000 gallons		-	THE RESERVE OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF	8760 hr/yr
EQT 0180	40D200 - Treatment Services Tank	47000 gallons				8760 hr/yr
EQT 0181	40D210 - Treatment Services Tank	12000 gallons				8760 hr/yr
EQT 0182	40D300 - Treatment Services Tank	8000 gallons				8760 hr/yr
EQT 0183	40D220 - Treatment Services Tank	8000 gallons				8760 hr/yr
QT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber			900 tons/day		8760 hr/yr
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber			1900 tons/day	, , ,	8760 hr/yr
EQT 0280	U1-Furn - Unit 1 Furnace			900 tons/day		8760 hr/yr
EQT 0281	U2-RFurn - Unit 2 Regen Furnace			1200 tons/day		8760 hr/yr
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace			700 tons/day		8760 hr/yr
EQT 0283	U1-Proc - Unit 1 Process	,		900 tons/day		8760 hr/yr
EQT 0284	U2-Proc - Unit 2 Process			1900 tons/day		8760 hr/yr
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions					8760 hr/yr
RLP 0013	2 - Sulfuric Acid Unit No. 2	· ·	2280 tons/day	1900 tons/day		8760 hr/yr
RLP 0014	3 - Sulfuric Acid Unit No. 1		1080 tons/day	900 tons/day	·	8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

#### Subject Item Inventory:

Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
ide :					
10 - Preheater; Acid Unit No. 1		6 MM BTU/hr	6 MM BTU/hr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses	8760 hr/yr
		22.5 tons/hr	135 Tons lime/year		6 hr/yr
12 - Oleum Loading Vent Scrubber		150 gallons/min			672 hr/yr
· ·	84460 gallons	670 tons/day	670 tons/day	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
24 - Oleum Barge Loading Scrubber		600 gallons/min	12.96 MM gallons/yr		400 hr/yr
28 - Gasoline Storage Tank	1000 gallons	10000 gallons/yr	10000 gallons/yr		8760 hr/yr
6-90 - Package Boiler		106 MM BTU/hr	50 MM BTU/hr	Natural Gas	8760 hr/yr
M1a - Unit 2 Cooling Tower			36000 gallons/min	<del></del>	8760 hr/yr
M1b - Unit 1 Cooling Tower					8760 hr/yr
	158605 gallons		3		8760 hr/yr
					8760 hr/yr
30D050 - 99WW Tank					8760 hr/yr
30D130 - Oleum Tank		<del></del>	<u> </u>		
30D180 - 93E Tank	285247 gallons			`	8760 hr/yr
	406414 gallons	1-4-	<del> </del>		8760 hr/yr
		· · · · · · · · · · · · · · · · · · ·	<del> </del>		8760 hr/yr
		***			8760 hr/yr
The same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the sa			1		8760 hr/yr
20D103 - Sulfur Unloading Tank	——————————————————————————————————————		<u> </u>		0700 ( -1
1-06 - Rental Boiler	100 ganotto	133 MM RTIUbe	133 MM PTU/5-		8760 hr/yr
	21000 gallons	100 MIN D LOVIII	199 MINI DI O/NE		8760 hr/yr
M10 - Diesel Fire-Water Pump	21000 ganons	200 horsenower	200 horsenower	<u> </u>	8760 hr/yr 500 hr/yr
	ide  10 - Preheater; Acid Unit No. 1  11 - Lime Silos  12 - Oleum Loading Vent Scrubber  20 - Sulfur Feed Tank  24 - Oleum Barge Loading Scrubber  28 - Gasoline Storage Tank  6-90 - Package Boiler  M1a - Unit 2 Cooling Tower  M1b - Unit 1 Cooling Tower  30D030 - Oleum Tank  30D040 - 93/Oleum  30D050 - 99WW Tank  30D130 - Oleum Tank  30D130 - Oleum Tank  30D130 - 93E Tank  30D210 - 93E Tank  30D220 - 99WW Tank  30D230 - 99C Tank	10 - Preheater; Acid Unit No. 1	10 - Preheater; Acid Unit No. 1	10 - Preheater; Acid Unit No. 1	10 - Preheater; Acid Unit No. 1

#### Stack Information:

ID ·	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Spent Acid Process		<del>72</del>					
ARE 0002 M4 - West End S	- I			<del></del>			72
EQT 0150 26 - Spent Acid E	Barge Loading Scrubber	27.81	1000	.87		13	120
EQT 0151 27 - Acid Plant V	•	21.7	21500	4.6		35	1520
EQT 0185 M7 - 001 Wastev	vater Treatment Unit						72
FUG 0002 FUG-ACID - Acid	Plant Fugitive Emissions						72
TS Process							
ARE 0003 M3 - Treatment S	Services Sumps				,		72

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

#### Stack Information:

ID Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
TS Process		,				
EQT 0147 21 - TS Vapor Combustor	7.7	13100	6		50	1600
FUG 0003 FUG-TS - Treatment Services Fugitive Emissions		1		<del></del>		72
RLP 0013 2 - Sulfuric Acid Unit No. 2	113.9	108705	4.5		130	90
RLP 0014 3 - Sulfuric Acid Unit No. 1	118.1	50080	3 .		130	90
Facility Wide			÷			
EQT 0140 10 - Preheater; Acid Unit No. 1	46	26500	3.5		62	550
EQT 0141 11 - Lime Silos	6.7	250	.89		55	100
EQT 0142 12 - Oleum Loading Vent Scrubber	4.4	51.84	.5		15	100
EQT 0146 20 - Sulfur Feed Tank	13.6	15,4	1.2		30	284
EQT 0149 24 - Oleum Barge Loading Scrubber	38	200	.33		12.5	72
EQT 0152 28 - Gasoline Storage Tank	0	.02	:33		5	72
EQT 0153 6-90 - Package Boiler	25	14000	3.5		60	850
EQT 0154 M1a - Unit 2 Cooling Tower	25.6	945476	28		46	89
EQT 0155 M1b - Unit 1 Cooling Tower	27.9	526811	20		46	89
EQT 0186 1-06 - Rental Boiler	15.4	22000	5.5		20	470
EQT 0291 M10 - Diesel Fire-Water Pump	6.5	76.8	.5		9.25	355

#### Relationships:

ID	Description	Relationship	di	Description
QT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0157	30D030 - Oleum Tank
QT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0158	30D040 - 93/Oleum
QT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0166	30D130 - Oleum Tank
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	ECT 0180	40D200 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	ECT 0179	40D290 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank

# **INVENTORIES**

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

### Relationships:

· ID	Description	Relationship	ID.	Description
QT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
QT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
QT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
QT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
QT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
QT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
QT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
QT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
QT 0184	20D103 - Sulfur Unloading Tank	Vents to	EQT 0146	20 - Sulfur Feed Tank
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
QT 0277	13 - Acid Plant Caustic Scrubber	Vents to	EQT 0151	27 - Acid Plant Vapor Combustor
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
QT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
QT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Vents to	RLP 0014	3 - Sulfuric Acid Unit No. 1
QT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Controls emissions from.	EQT 0283	U1-Proc - Unit 1 Process
QT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Controls emissions from	EQT 0284	U2-Proc - Unit 2 Process
QT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Vents to	RLP 0013	2 - Sulfuric Acid Unit No. 2
QT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
QT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
QT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
QT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
QT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
QT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
QT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
QŤ 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
QT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
QT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
QT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
QT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank

## INVENTORIES

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

### Relationships:

di	Description	Relationship	ID	Description
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
EQT 0283	U1-Proc - Unit 1 Process	Controls emissions from	EQT 0280	U1-Furn - Unit 1 Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0281	U2-RFurn - Unit 2 Regen Furnace

## Subject Item Groups:

1D	Group Type	Group Description
CRG 0001	Common Requirements Group	CRG001 - 40D250, 40D280, and 40D200
CRG 0002	Common Requirements Group	CRG002 - 40D290, 40D210, 40D300, and 40D220
CRG 0003	Common Requirements Group	CRG003 - Spent Acid Tanks
CRG 0004	Common Requirements Group	CRG004 - 99/Oleum/Spent Swing Tanks
GRP 0002	Equipment Group	SAU - SULFURIC ACID UNITS 1 & 2
GRP 0021	Equipment Group	Comb - Combustion (Unit 1, Unit 2, Package Boiler, Rental Boiler)
PCS 0001	Process Group	Spt-Proc - Spent Acid Process
PCS 0002	Process Group	TS-Proc - TS Process
UNF 0002	Unit or Facility Wide	UNF02 - Facility Wide

### Group Membership:

1D	Description	Member of Groups
ARE 0002	M4 - West End Sump	PCS000000001
ARE 0003	M3 - Treatment Services Sumps	PCS0000000002
CRG 0001	CRG001 - 40D250, 40D280, and 40D200	PCS000000002
CRG 0002	CRG002 - 40D290, 40D210, 40D300, and 40D220	PCS000000002
CRG 0003	CRG003 - Spent Acid Tanks	PCS000000001
CRG 0004	CRG004 - 99/Oleum/Spent Swing Tanks	PCS000000001
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	CRG000000003, PCS000000001
EQT 0147	21 - TS Vapor Combustor	PCS0000000002
EQT 0150	26 - Spent Acid Barge Loading Scrubber	PCS000000001
EQT 0151	27 - Acid Plant Vapor Combustor	PCS000000001
EQT 0153	6-90 - Package Boiler	GRP000000021
EQT 0161	30D070 - Spent Acid Tank	CRG0000000003, PCS000000001
EQT 0163	30D100 - Spent Acid Tank	CRG000000003, PCS000000001
EQT 0164	30D110 - Spent Acid Tank	CRG000000003, PCS000000001
EQT 0165	30D120 - Spent Acid Tank	CRG000000003, PCS000000001

## **INVENTORIES**

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

Group Membership:

ID	Description	Member of Groups
EQT 0167	30D140 - 99/Oleum/Spent	CRG0000000004, PCS0000000001
EQT 0168	30D150 - 99/Oleum/Spent	CRG0000000004, PCS0000000001
EQT 0169	30D160 - Spent Acid Tank	CRG0000000003, PCS000000001
EQT 0171	30D190 - Spent Acid Tank	CRG000000003, PCS000000001
EQT 0176	20D120/30D240 - IFS Mix Tank	PCS0000000001
EQT 0177	40D250 - Treatment Services Tank	CRG000000001, PCS000000002
EQT 0178	40D280 - Treatment Services Tank	CRG000000001, PCS000000002
EQT 0179	40D290 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0180	40D200 - Treatment Services Tank	CRG0000000001, PCS000000002
EQT 0181	40D210 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0182	40D300 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0183	40D220 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0185	M7 - 001 Wastewater Treatment Unit	PCS0000000001
EQT 0186	1-06 - Rental Boiler	GRP000000021
EQT 0277	13 - Acid Plant Caustic Scrubber	PC\$000000001
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	PC\$000000002
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	PCS0000000002
EQT 0280	U1-Furn - Unit 1 Furnace	PCS0000000002
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	PCS0000000002
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace	PC\$000000002
EQT 0283	U1-Proc - Unit 1 Process	PC\$000000002
EQT 0284	U2-Proc - Unit 2 Process	PC\$00000002
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions	PCS0000000001
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions	PCS0000000002
RLP 0013	2 - Sulfuric Acid Unit No. 2	GRP000000002, GRP0000000021, PCS0000000002
RLP 0014	3 - Sulfuric Acid Unit No. 1	GRP000000002, GRP000000021, PCS0000000002

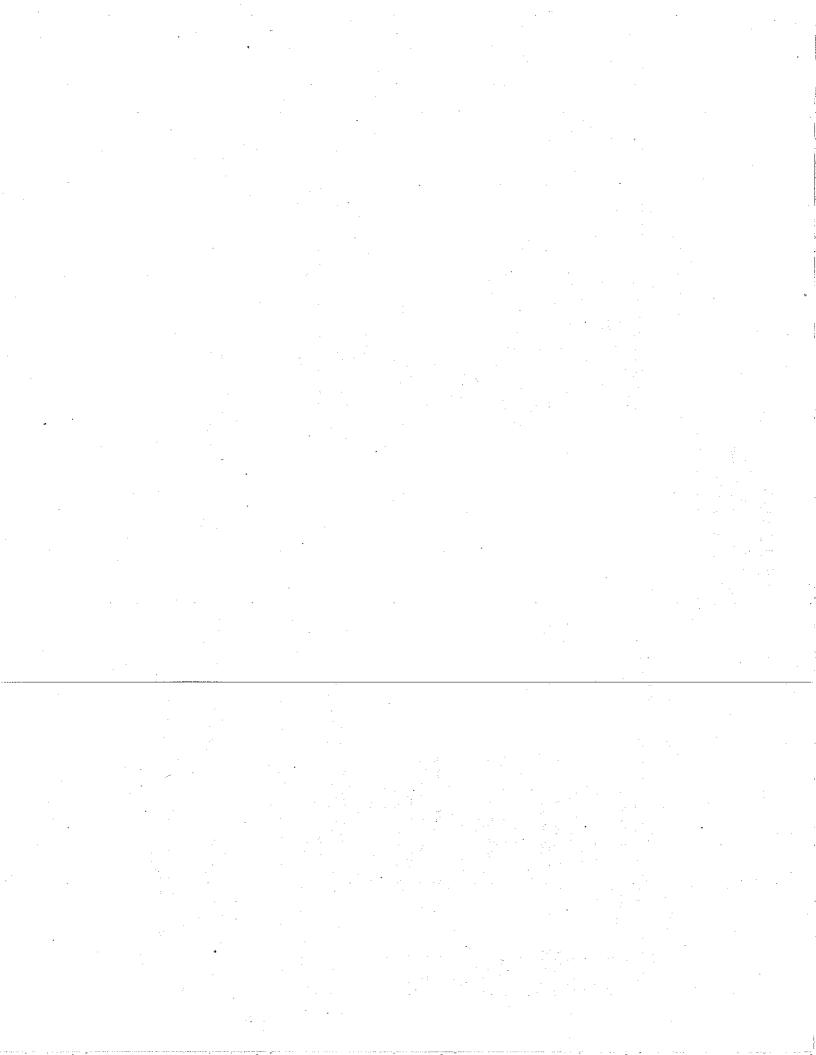
NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

### Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0540	0540 Sulphuric Acid Manufacture (Rated Capacity)	2800	tons/day

### SIC Codes:

2819	Industrial inorganic chemicals, nec	AI 131	4
2819	Industrial inorganic chemicals, nec	UNF 0	02



	CO			NOx	<del></del>		PM10			SO2	***************************************	
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Spent Acid Process												
ARE 0002 M4												
EQT 0150		<del></del>			<del> </del>					0.002	0.00	10.04
EQT 0151	1.69	15.13	7.40	0.29	6.89	4.00	0.00				0.03	<0.01
27 EQT 0185		10.10	7,40	0.29	0.09	1.29	0.02	0.06	0.07	, 0.01	0.40	0.04
м7 FUG 0002		<u> </u>										
FUG-ACID							0.10		0,46	0.31		1.38
TS Process												
ARE 0003 мз												<u> </u>
EQT 0147 21	0.92	6.40	4.04	0.88	6.99	3.85	80.0	0.08	0.37	0.06	0.28	0.25
FUG 0003 FUG-TS												
RLP 0013 2		74.61			134.56		<del></del>	23.75				
RLP 0014 3		44.26			63.27			11.25			904.17	
Facility Wide							·					ļ
EQT 0140	0.47	0.47	2.06	0.56	0.56	2.45	0.04	0.04	0.19	0.003	0.003	0.01
EQT 0141			<del></del>				2.48		0.01			
EQT 0142	<del></del> -		· · · · · · · · · · · · · · · · · · ·			,	0.01	0.09	<0.01			
EQT 0146	V-11PER				<u> </u>	· · · · · · · · · · · · · · · · · · ·	· ·			0.01	0.11	0.04
EQT 0149					<del> </del>		0.004	0.01	<0.01	0.01	0.11	0.04
EQT 0152		<del> </del>						0.51	10.01			
EQT 0153 6-90		18.76			21.20			1.27			0.58	
EQT 0154 M1s	·		ļ			<del> </del>	0.63	1,41	2.76		0.56	
EQT 0155							0.28		1.23			
м1ь EQT 0186		3.59			5.05		0.20	0.99	1.23		0.00	
1-06 EQT 0291	1.34		0.33	6.20	3.03	1 55	0.44	0.88	0.44	0.44	80.0	
M10	1.04		0.33	0.20		1.55	0.44		0.11	0.41		0.10

	VOC			Lead					
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year			
Spent Acid Process									
ARE 0002 M4	0.03		0.14						
EQT 0150 26	1.12	51.40	0.93						
EQT 0151 27	0.45	7.64	1.95	<u> </u>	,				
EQT 0185 M7	0.44		1.91						
FUG 0002 FUG-ACID	0.15		0.65						
TS Process	1								
ARE 0003 мз	0.02		. 0.07						
EQT 0147 21	0.21	0.28	0.92						
FUG 0003 FUG-TS	0.67		2.94		-				
RLP 0013		2.73			0.12	·			
RLP 0014 3		0.94			0.08				
Facility Wide									
EQT 0140	0.03	0.03	0.13	-					
EQT 0141	··								
EQT 0142									
EQT 0146 20	0.07	0.45	0.29						
EQT 0149 24									
EQT 0152	0.07	***************************************	0.29						
EQT 0153 6-90		2.97			1/-				
EQT 0154 M1a									
EQT 0155 M1b			-						
EQT 0186 1-06		0.72				<del> </del>			
EQT 0291 M10	0.50		0.13						

	СО			NOx			PM10			SO2		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Facility Wide												
GRP 0002 SAU				*	·····							
GRP 0021 Comb	20.54		89.98	25.00		109.50	12.27		53.73	245.69		1076.13

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	voc			Ī	Lead		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	1	vg lb/hr	Max lb/hr	Tons/Year
Facility Wide							
GRP 0002 sau	Marie Marie Marie Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San Carrier San				0.02		0.08
GRP 0021 Comb	4.46		19.52				

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0142 12	Sulfuric acid	0.01	0.09	<0.01
QT 0146 0	Carbon disulfide	0.07	0.45	0.29
	Carbonyl sulfide	<0.001	0.001	<0.01
	Hydrogen sulfide	0.49	2.23	2.16
EQT 0147	Chlorine	0.004	0.03	0.02
	Hydrochloric acid ·	0.08	0.52	0.36
QT 0149 4	Sulfuric acid	0.004	0.01	<0.01
QT 0151 7	Chlorine	0.005	0.11	0.02
	Hydrochloric acid	0.09	2.24	0.39
QT 0152 8	2,2,4-Trimethylpentane	0.001		<0.01
	Benzene	0.001		<0.01
	Ethyl benzene	<0.001		<0.01
•	Toluene	0.001		<0.01
	Xylene (mixed isomers)	<0.001		<0.01
	n-Hexane	0.001		<0.01
UG 0002 UG-ACID	Sulfuric acid	0.10		0.46
GRP 0002 AU	Antimony (and compounds)	0.007		0.032
	Arsenic (and compounds)	0.005		0.022
	Barium (and compounds)	0.041		. 0.181
	Beryllium (Table 51.1)	0.003		0.012
	Cadmium (and compounds)	0.003		0.012
	Chlorine	0.39		1.70
	Chromium VI (and compounds)	0.007		0.030
	Cobalt compounds	0.01		0.03
	Copper (and compounds)	0.025		0.111
. •	Hydrochloric acid	0.82		3.59
	Manganese (and compounds)	0.02		0.08
	Mercury (and compounds)	0.003		0.012
	Nickel (and compounds)	0.009		0.038
	Selenium (and compounds)	0.013		0.056
	Sulfuric acid	9.57		41.90
	Zinc (and compounds)	0.05	- DATE: 1	0.22
CS 0001 ot-Proc	1,1,1-Trichloroethane	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0001 pt-Proc	1,1,2,2-Tetrachloroethane	0.005		0.02
	1,1,2-Trichloroethane	0.05		0.20
·	1,1-Dichloroethane	0.11		0.50
* .	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
•	1,2-Dibromoethane	<0.001		0.001
	1,2-Dichloroethane	0.001		0.002
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
•	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	<0.001		0.001
	1,3-Dichloropropene	0.005		0.02
	1,4-Dichlorobenzene	0.11		0.50
. *	1,4-Dioxane	0.01		0.05
	2,2'-dichlorodiethylether	0.03		0.11
	2,2,4-Trimethylpentane	0.11		0.50
	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11		0.50
	2,4-Dinitrotoluene	0.002		0.01
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.002		0.01
	2-Acetylaminofluorene	0.11	-	0.50
	2-nitro-Propane	0.03		0.14
	3,3'-Dichlorobenzidine	0.11		0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spl-Proc	4-Dimethylaminoazobenzene	0.11		0,50
	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.01		0.04
-	Acetamide	0.11		0.50
	Acetonitrile ·	0.06		0.25
	Acetophenone	0.11		0.50
	Acrolein	<0.001		0.001
	Acrylamide	<0.001		0.001
	Acrylic acid	0.005		0.02
	Acrylonitrile	<0.001		0.002
	Allyl chloride	<0.001		0.001
	Amiben	0.11		0.50
	Ammonia	0.01		0.06
	Aniline	0.01		0.03
	Benzene	0.002		0.01
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
,	Benzyl chloride	0.11		0.50
	Biphenyl	0.002		0.01
	Bromoform	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
	Carbaryl	0.11		0.50
	Carbon disulfide	0.03		0.12
	Carbon tetrachloride	0.002		0.01
	Carbonyl sulfide	. 0.01	- #	0.05
	Chlordane	0.11		0.50
	Chlorine dioxide	<0.001		0.001
	Chloroacetic acid	0.11	•	0.50
	Chlorobenzene	<0.001	<del></del>	0.001
	Chloroethane	0.11		0.50
	Chloroform	0.002		0.01

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.03		0.14
	Cresol	0.02		0.08
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.002		0.01
•	Diazomethane	0.11		0.50
•	Dibutyl phthalate	0.005		0.02
:	Dichloromethane	0.01		0.03
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
	Epichlorohydrin	0.04		0.17
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
• •	Ethyl Acrylate	0.02		0.08
	Ethyl benzene	0.11		0.50
	Ethylene glycol	,. 0.10		0.45
	Ethylene oxide	<0.001		0.002
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11		0.50
	Formaldehyde	0.002		0.01
	Glycol ethers (Table 51.1)	0.01		0.06
	Glycol ethers (Table 51.3)	0.11		0.50
	Heptachlor	0.11		0.50
·	Hexachlorobenzene	0.01		0.04
	Hexachlorobutadiene	<0.001		0.001
	Hexachlorocyclopentadiene	0.11	·	0.50
	Hexachloroethane	0.01		0.04
	Hexamethylene diisocyanate	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max Ib/hr	Tons/Year
PCS 0001 pt-Proc	Hexamethylphosphoramide	0.11		0.50
•	Hydrazine	<0.001	,	0.001
	Hydrofluoric acid	0.002		0.01
	Hydrogen cyanide	0.01		0.04
	Hydrogen sulfide	0.002		0.01
-	Hydroquinone	0.11		0.50
	lodomethane	0.11		0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.002		0.01
	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl Isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50
	Methyl chloride	0.09		0.39
	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002		0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
	Naphthalene (and Methyl naphthalenes)	0.02		0.10
	Nitric acid	0.005		0.02
	Nitrobenzene	0.005		0.02
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenoi	0.005		0.02
	Phosgene	<0.001		0.002

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Phosphine	0.11		0.50
•	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.005		0.02
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	<0.001		0.001
:	Propionaldehyde	0.01		0.04
	Propoxur	0.11		0.50
	Propylene oxide	0.01		0.04
	Propylenimine	0.11		0.50
	Pyridine	0.01		0.06
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.02		0.10
	Tetrachloroethylene	0.03		0.14
	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	<0.001		0.001
	Toluene-2,6-Diisocyanate	<0.001		0.001
. 15	Toxaphene	0.11		. 0.50
,	Trichloroethylene	0.01		0.05
	Triethyl amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
•	Vinyl acetate	0.03		0.13
	Vinyl bromide	0.11		0.50
• .	Vinyl chloride	0.002		0.01
	Vinylidene chloride	0.02		0.08
	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11		0.50
-	beta-Propriolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	n-Hexane	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11	·	0.50
	p,p'-DDE	0.11		0.50
	para-Phenylenediamine	0.11		0.50
	pentachioro-Phenol	0.11		0.50
CS 0002 S-Proc	1,1,1-Trichloroethane	0.11		0.50
	1,1,2,2-Tetrachloroethane	0.03		0.12
	1,1,2-Trichioroethane	0.11		0.50
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	0.003		0.011
•.	1,2-Dichloroethane	0.005		0.021
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
•	1,2-Epoxybutane	0.11		0.50
٠.	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11	10000	0.50
	1,3-Butadiene	0.003		0,011
	1,3-Dichloropropene	0.03		0.14
•	1,4-Dichlorobenzene	0.11		0.50
	1,4-Dioxane	0.10		0.44
	2,2'-dichlorodiethylether	0.11		0.50
	2,2,4-Trimethylpentane	0.11		0.50
	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11		0,50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 S-Proc	2,4-Dînitrotoluene	0.01		.0.03
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.01		0.03
	2-Acetylaminofluorene	0.11		0.50
	2-nitro-Propane	0.11		0.50
	3,3'-Dichlorobenzidine	0.11	-	0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50
•	4-Dimethylaminoazobenzene	0.11	1	0.50
	4-Nitrobiphenyl	0.11	<u>, , , , , , , , , , , , , , , , , , , </u>	0.50
	4-Nitrophenol	0.11		0.50
•	Acetaldehyde	0.07	* /	0.30
	Acetamide	0.11		0.50
	Acetonitrile	0.11	-	<b>o</b> 0.50
	Acetophenone	0.11		0.50
	Acrolein	0.003		0.011
	Acrylamide ·	0.003		0.011
	Acrylic acid	0.04		0.17
	Acrylonitrile	0.003		0.015
	Allyl chloride	0.003		0.011
	Amiben	0.11		0.50
	Ammonia	0.11		0.50
	Aniline	0.06		0.26
	Benzene	0.02		0.10
	Benzidine	0.11		0.50
	Benzotrichloride .	0.11	· · · · · · · · · · · · · · · · · · ·	0.50
	Benzyl chloride	0.11		0.50
	Biphenyl .	0.01		0.03
	Bromoform	0.11		0.50
	Calcium cyanamide	0.11	<u> </u>	0.50
	Captan	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0002 S-Proc	Carbaryl	0.11		0.50
	Carbon disulfide	0.11		0.50
	Carbon tetrachloride	0.01		0.03
•	Carbonyl sulfide	- 0.10		0.43
	Chlordane	0.11		0.50
	Chlorinated Dibenzo-P-Dioxins	1.0E-08		5.0E-08
	Chlorinated dibenzofurans	1.0E-08		5.0E-08
	Chlorine dioxide	0.003		0.011
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	0.003		0.011
	Chloroethane	0.11		0.50
	Chloroform	0.005		0.02
	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.11		0.50
	Cresol	0.11		0.50
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.03		0.11
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.04		0.16
	Dichloromethane	0.05		0.23
•	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
	Epichlorohydrin	0.11		0.50
•	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.11		0.50
	Ethyl benzene	0.11		0.50
	Ethylene glycol	0.11	*	0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0002 S-Proc	Ethylene oxide	0.003	,	0.015
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11		0.50
	Formaldehyde	0.03	-	0.11
	Glycol ethers (Table 51.1)	0.11		0.50
	Glycol ethers (Table 51.3)	0.11		0.50
	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.08		0.37
	Hexachlorobutadiene	0.003		0.011
	Hexachlorocyclopentadiene	0.11		0.50
	Hexachloroethane	0.07		0.30
	Hexamethylene diisocyanate	0.11		0.50
	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	0.003		0.011
	Hydrofluoric acid	0.005		0.02
	Hydrogen cyanide	0.08		0.34
	Hydrogen sulfide	0.01		0.04
•	Hydroquinone	0.11		0.50
	lodomethane	0.11		0.50
	Isophorone	0.11		0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.005		0.02
. •	Methanol	0.11		0.50
	Methoxychlor	0.11		0.50
	Methyl Isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
•	Methyl bromide	0.11		0.50
	Methyl chloride	0.11		0.50
	Methyl ethyl ketone	0.11		0.50
	Methyl isobutyl ketone	0.002	,	0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
	Monomethyl hydrazine	0.11	· · · · · · · · · · · · · · · · · · ·	0.50

Emission Pt.	Pollutant	Avg lb/hr	Max (b/hr	Tons/Year
PCS 0002 S-Proc	N,N-Diethyl aniline	0.11		0.50
<del></del>	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
. •	Naphthalene (and Methyl naphthalenes)	0.11		0.50
	Nitric acid	0.03		0.12
	Nitrobenzene	0.04		0.17
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenol	0.04		0.16
	Phosgene	0.003		0.012
	Phosphine	0.11		0.50
•	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.04		0.17
	Polychlorinated biphenyls	0.11		0.50
_	Polynuclear Aromatic Hydrocarbons	0.003		0.011
. '	Propionaldehyde	0.07		0.30
•	Propoxur	0.11		0.50
	Propylene oxide	0.07		0.30
	Propylenimine	0.11		0.50
•	Pyridine	0.11		0.50
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.11		0.50
	Tetrachloroethylene	0.11		0.50
	Titanium tetrachloride	0.11 .		0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	0.003		0.011
	Toluene-2,6-Diisocyanate	0.003		0.011
	Toxaphene	0.11		0.50
•	Trichloroethylene	0.09		0.38

Emission Pt.	Pollutant	Avg lb/hr	Max ib/hr	Tons/Year
PCS 0002 rs-Proc	Triethy! amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
•	Vinyl acetate	0.11		0.50
	Vinyl bromide	0.11		0.50
1	Vinyl chloride	0.02		0.10
	Vinylidene chloride	0.11		0.50
•	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11		0.50
	beta-Propriolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50
	n-Hexane	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
V	o-dianisidine	0.11		0.50
· · · · · · · · · · · · · · · · · · ·	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11	÷	0.50
	para-Phenylenediamine	0.11		0.50
	pentachioro-Phenoi	0.11		0.50
LP 0013	Antimony (and compounds)		0.671	
	Arsenic (and compounds)		0.001	
	Barium (and compounds)		1.313	
•	Beryllium (Table 51.1)		0.001	
	Cadmium (and compounds)		0.001	
	Chlorine		0.57	<u> </u>
	Chromium VI (and compounds)	· · · · · · · · · · · · · · · · · · ·	0.006	
	Cobalt compounds		0.17	
	Copper (and compounds)		0.632	
	Hydrochtoric acid		2.12	
	Manganese (and compounds)		0.43	•
	Mercury (and compounds)		0.013	

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
RLP 0013	Nickel (and compounds)		0.006	
•	Selenium (and compounds)		0.413	
	Sulfuric acid		11.88	
	Zinc (and compounds)		1.24	
RLP 0014	Antimony (and compounds)		0.466	
	Arsenic (and compounds)		0.004	
	Barium (and compounds)		0.778	
	Beryllium (Table 51.1)		<0.001	
	Cadmium (and compounds)		<0.001	
	Chlorine		0.21	
	Chromium VI (and compounds)		0.001	
	Cobalt compounds		0.10	
•	Copper (and compounds)		0.379	
	Hydrochloric acid		14.87	
	Manganese (and compounds)		0.26	
	Mercury (and compounds)		0.011	
	Nickel (and compounds)		0.003	
	Selenium (and compounds)		0.373	
•	Sulfuric acid		5.63	
	Zinc (and compounds)		0.75	
NF 0002 NF02	1,1,1-Trichloroethane			1.00
42	1,1,2,2-Tetrachloroethane			0.14
	1,1,2-Trichloroethane			0.70
	1,1-Dichloroethane			1.00
	1,1-Dimethylhydrazine			1.00
	1,2,4-Trichlorobenzene			1.00
	1,2-Dibromo-3-chloropropane			1.00
	1,2-Dibromoethane			0.012
	1,2-Dichloroethane			0.023
	1,2-Dichloropropane			1.00
	1,2-Diphenylhydrazine			1.00
	1,2-Epoxybutane		<u> </u>	1.00
	1,2-Epoxyethylbenzene		·	1.00

Emission Pt.	mission Pt. Pollutant		Max lb/hr	Tons/Year	
UNF 0002 UNF02	1,2-Oxathiolane 2,2-dioxide			1.00	
•	1,3-Butadiene			0.012	
•	1,3-Dichloropropene			0.16	
	1,4-Dichlorobenzene			1.00	
	1,4-Dioxane	•		0.49	
	2,2'-dichlorodiethylether		·	0.61	
	2,2,4-Trimethylpentane	,		1.01	
	2,4,5-Trichlorophenol			1.00	
er e	2,4,6-Trichlorophenol			1.00	
	2,4-Dichlorophenoxyacetic Acid			1.00	
	2,4-Dinitrophenol			1.00	
	2,4-Dinitrotoluene			0.04	
	2,4-Toluene diamine		-	1.00	
	2,6-Dinitrotoluene			0.04	
	2-Acetylaminofluorene			1.00	
	2-nitro-Propane			0.64	
	3,3'-Dichlorobenzidine			1.00	
	4,4'-Methylenebis-(2-Chloroaniline)			1.00	
	4,4'-Methylenebisbenzeneamine			1.00	
	4,6 Dinitro-o-cresol			1.00	
	4-Aminodiphenyl			1.00	
	4-Dimethylaminoazobenzene			1.00	
	4-Nitrobiphenyl			1.00	
	4-Nitrophenol			1.00	
	Acetaldehyde ´	· · · · · · · · · · · · · · · · · · ·		0.34	
	Acetamide	· · · · · · · · · · · · · · · · · · ·		1.00	
•	Acetonitrile			0.75	
	Acetophenone			1.00	
	Acrolein			0.012	
·	Acrylamide			0.012	
	Acrylic acid			0.19	
	Acrylonitrile			0.017	
	Allyl chloride	<u></u>		0.012	

Emission Pt.	Pollutant	Avg lb/hr	Max Ib/hr	Tons/Year
NF 0002 NF02	Amiben	!		1.00
02	Ammonia			0.56
	Aniline			0.29
	Antimony (and compounds)			0.032
	Arsenic (and compounds)			0.022
	Barium (and compounds)			0.181
	Benzene			0.12
	Benzidine			1.00
	Benzotrichloride			1.00
	Benzyl chloride			1.00
	Beryllium (Table 51.1)			0.012
	Biphenyl			0.04
	Bromoform			1.00
	Cadmium (and compounds)			0.012
	Calcium cyanamide			1.00
	Captan			1.00
	Carbaryl			1.00
	Carbon disulfide			0.91
•	Carbon tetrachloride			0.04
	Carbonyl sulfide			0.49
	Chlordane			1.00
	Chlorinated Dibenzo-P-Dioxins			5.0E-08
-	Chlorinated dibenzofurans			5.0E-08
	Chlorine		1.33	1.74
	Chlorine dioxide			0.012
	Chloroacetic acid			1.00
•	Chlorobenzene			0.012
	Chloroethane			1.00
	Chloroform			0.03
	Chioromethyl methyl ether			1.00
	Chloroprene	ĺ		0.64
	Chromium Vi (and compounds)			0.030
	Cobalt compounds			0.03

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
JNF 0002 INF02	Copper (and compounds)			0.111
	Cresol			0.58
	Cumene			1.00
	Cyanide compounds			1.00
	Diaminotoluene (mixed isomers)			0.12
	Diazomethane			1.00
	Dibutyl phthalate			0.18
	Dichloromethane			0.26
•	Dichlorvos			1.00
	Diethanolamine			1.00
•	Diethyl Sulfate			1.00
	Dimethyl formamide			1.00
	Dimethyl phthalate		·	1.00
	Dimethyl sulfate			1.00
	Dimethylcarbamoyl chloride			1.00
	Epichlorohydrin			0.67
	Ethyl 4,4'-Dichlorobenzilate			1.00
	Ethyl Acrylate			0.58
	Ethyl benzene			1.01
• .	Ethylene glycol			0.95
	Ethylene oxide			0.017
	Ethyleneimine			1.00
	Ethylenethiourea			1.00
	Formaldehyde			0.12
	Glycol ethers (Table 51.1)			0.56
. •	Glycol ethers (Table 51.3)			1.00
	Heptachlor			1.00
	Hexachlorobenzene			0.41
	Hexachlorobutadiene			0.012
	Hexachlorocyclopentadiene			1.00
	Hexachioroethane			0.34
	Hexamethylene diisocyanate			1.00
	Hexamethylphosphoramide			1.00

Emission Pt.	Pollutant Avg lb/hr		Max lb/hr	Tons/Year	
UNF 0002 UNF02	Hydrazine			0.012	
	Hydrochloric acid			4.34	
	Hydrofluoric acid			0.03	
	Hydrogen cyanide			0.38	
	Hydrogen sulfide			2.21	
	Hydroquinone			1.00	
	lodomethane			1.00	
	Isophorone			1.00	
	Lindane			1.00	
-	Maleic anhydride			0.03	
	Manganese (and compounds)		107	0.08	
•	Mercury (and compounds)			0.012	
	Methanol			1.00	
	Methoxychlor		- Company	1.00	
	Methyl Isocyanate			1.00	
	Methyl Tertiary Butyl Ether			1.00	
	Methyl bromide	·		1.00	
	Methyl chloride			0.89	
	Methyl ethyl ketone			1.00	
	. Methyl isobutyl ketone			0.02	
	Methyl methacrylate			1.00	
-	Methylene diphenyl diisocyanate			1.00	
<u> </u>	Monomethyl hydrazine			1.00	
	N,N-Diethyl aniline			1.00	
	N,N-dimethylbenzenamine			1.00	
	N-Nitroso-N-Methylurea		45.55	1.00	
	N-Nitrosodimethylamine			1.00	
	N-Nitrosomorpholine			1.00	
	Naphthalene (and Methyl naphthalenes)			0.60	
-	Nickel (and compounds)			0.038	
	Nitric acid			0.14	
	Nitrobenzene		•	0.19	
	Parathion			1.00	

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
INF 0002 INF02	Pentachloronitrobenzene			1,00
	Phenot			0.18
	Phosgene			0.014
	Phosphine			1.00
	Phosphorus, Total (as P)			1.00
	Phthalic Anhydride			0.19
•	Polychiorinated biphenyls			1.00
	Polynuclear Aromatic Hydrocarbons		. ,	0.012
	Propionaldehyde			0.34
	Propoxur			1.00
	Propylene oxide			0.34
	Propylenimine			1.00
	Pyridine			0.56
	Pyrocatechol			1.00
	Quinoline			1.00
	Quinone		·	1.00
	Selenium (and compounds)			0.056
	Styrene			0.60
	Sulfuric acid			42.38
	Tetrachloroethylene			0.64
	Titanium tetrachloride			1.00
	Toluene			1.01
	Toluene-2,4-diisocyanate			0.012
	Toluene-2,6-Diisocyanate			0.012
	Toxaphene			1.00
	Trichloroethylene			0.43
	Triethyl amine	1.		1.00
	Trifluralin			1.00
	Urethane			1.00
•	Vinyl acetate			0.63
	Vinyl bromide			1.00
•	Vinyl chloride			0.11
	Vinylidene chloride			0.58

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002 UNF02	Xylene (mixed isomers)			1.01
v <u>-</u>	Zinc (and compounds)			0.22
	alpha-Chloroacetophenone			1.00
	beta-Propriolactone			1.00
•	bis(2-ethylhexyl)phthalate			1.00
	bis(Chloromethyl)ether			1.00
	n-Hexane			1.01
	n-butyl alcohol			1.00
	o-Aminoanisole			1.00
	o-dianisidine		·	1.00
	ortho-Tolidine			1.00
	ortho-Toluidine			1.00
	p,p'-DDE			1.00
	para-Phenylenediamine		, , , , ,	1.00
	pentachtoro-Phenol			1.00

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.



Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

## Group: PCS 0001 Spent Acid Process

Group Members: ARE 0002 CRG

CRG 0004 EQT 0008EQT 0150EQT 0151EQT 0161EQT 0163EQT 0164EQT 0165EQT 0167EQT 0168EQT 0169EQT 0171EQT 0176EQT 0185EQT 0277FUG 0002

### ARE 0002 M4 - West End Sump

1 [LAC 33:III.5107.A.2]

Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

## CRG 0003 CRG003 - Spent Acid Tanks

Group Members: EQT 0008 EQT 0161 EQT 0163 EQT 0164 EQT 0165 EQT 0169 EQT 0171

. 2	[40 CFR 60.110b(e)]	Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e),
		(f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
3	[40 CFR 65.145(c)(2)]	Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent
		(Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
		Which Months: All Year Statistical Basis: None specified
4	[40 CFR 65.42(b)(5)]	Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet
		emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction.
		Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
5	[40 CFR 65.47(b)]	Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of
		the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40]
		CFR 65.47(b)]

## CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

#### Group Members: EQT 0167EQT 0168

6	[40 CFR 60.110b(e)]	Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e),
		(f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]
7	[40 CFR 65.145(c)(2)]	Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent
		(Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]
:		Which Months: All Year Statistical Basis: None specified
8	[40 CFR 65,42(b)(5)]	Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet
		emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction.
		Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]
9	[40 CFR 65.47(b)]	Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of
	•	the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40]
	•	CFR 65.47(b)]

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Al ID: 1314 - Rhodia Inc. Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

## Group: PCS 0001 Spent Acid Process

CRG 0004	CRG004 -	99/Oleum/Spent	Swing	Tanke
<del></del>	0110007	- OO O COUNTY OP CITE	OAASIIM	Iaiinə

10 [LAC 33:III.501.C.6]

The requirements listed under CRG004 for the 99/Oleum/Spent Swing Tanks (EQT167 & EQT168) only apply when these tanks are in Spent Acid Service.

## EQT 0150 26 - Spent Acid Barge Loading Scrubber

[LAC 33:III.501.C.6]	Pressure recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
[LAC 33:III.501.C.6]	Pressure monitored by pressure instrument once every four hours when barge vents are routed to scrubber. STATE ONLY.
·	Which Months: All Year Statistical Basis: None specified
[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
	specified. Submit report to the Office of Environmental Compliance, Enforcement Division, STATE ONLY.
[LAC 33:III.501.C.6]	pH monitored by pH instrument once every four hours when barge vent are routed to scrubber. STATE ONLY.
	Which Months: All Year Statistical Basis: None specified
[LAC 33:III.501.C.6]	pH >= 10 s.u. when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY.
	Which Months: All Year Statistical Basis: Four-hour average
[LAC 33:III.501.C.6]	This scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubbber unit. All specific requirmenmts and
	emission limits will continue to apply.
	[LAC 33:III.501.C.6] [LAC 33:III.501.C.6] [LAC 33:III.501.C.6] [LAC 33:III.501.C.6] [LAC 33:III.501.C.6]

[LAC 33:III.501.C.6] pH recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. Because this scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubber unit. All specific requirements and emission limits will continue to

apply. STATE ONLY.

Packed Column Spray Nozzle Pressure >= 15 psig when barge vents are routed to scrubber. Permittee is allowed one excused excursion per 18 [LAC 33:III.501.C.6] semi-annual period. STATE ONLY.

Which Months: All Year Statistical Basis: Four-hour average

19 [LAC 33:III.5107.A.2]

Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. STATE ONLY.

## EQT 0151 27 - Acid Plant Vapor Combustor

21 [40 CFR 65.145(a)]

20 [40 CFR 65.145(a)]	Temperature >= 1512	when regulated tanks are venting to the APVC; or VOC, Total >= 95 % destruction removal efficiency (DRE) when
	calculated by time-wei	ghted average factoring in the amount of time vented to Sulfuric Acid Unit No. 1 (RLP 014). Subpart G. [40 CFR
	65.145(a)]	

Which Months: All Year Statistical Basis: Daily average

The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]

Al ID: 1314 - Rhodia Inc

Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

# Group: PCS 0001 Spent Acid Process

## EQT 0151 27 - Acid Plant Vapor Combustor

22	[40 CFR 65.145(c)(1)]	Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper
		operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65.  Subpart G. [40 CFR 65, 145(c)(1)]
23	[40 CFR 65.145(c)(2)]	Temperature monitored by temperature monitoring device at the approved frequency. Monitor the firebox temperature. Subpart G. [40 CFR 65.145(c)(2)]
•	140 CDD CC 1403	Which Months: All Year Statistical Basis: Daily average
. 24	[40 CFR 65.163]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65, 163(a) through (e), as applicable. Subpart G.
25	[40 CFR 65.5(c)]	Submit Startup, Shutdown, and Malfunction Report: Due by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate), unless the information is submitted with the periodic report. Include the information specified in 40 CFR 65.6(c)(1) through (c)(4), as appropriate. Subpart A. [40 CFR 65.5(c)]
26	[40 CFR 65.5(e)]	Submit Periodic Report: Due semiannually, no later than 60 calendar days after the end of each six-month period. Include all information specified in subparts of 40 CFR 65 and in 40 CFR 65.5(f). Subpart A. [40 CFR 65.5(e)]
27	[40 CFR 65.6(b)(1)]	Develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the regulated source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Address routine or otherwise predictable CPMS malfunctions. Develop the plan by the regulated source's implementation date as specified in 40 CFR 65.1(f), or for sources referenced from 40 CFR 63 Subpart F, by the
	1	compliance date specified in 40 CFR 63 Subpart F. Subpart A. [40 CFR 65.6(b)(1)]
28	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
0.0	[T + G 00 W 10 t c]	Which Months: All Year Statistical Basis: None specified
29	[LAC 33:III.1311.C]	Opacity <= 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
30	[LAC 33:III.5107.A.2]	Which Months: All Year Statistical Basis: Six-minute average Emits Class II TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

# EQT 0176 20D120/30D240 - IFS Mix Tank

31 [LAC 33:III.2103.A]	Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure
	greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
32 [LAC 33:III.2103.1]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

## Group: PCS 0001 Spent Acid Process

### EQT 0176 20D120/30D240 - IFS Mix Tank

33 [LAC 33:III.5107.A.2]

Emits Class I and/or Class III and/or Class III TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

### EQT 0185 M7 - 001 Wastewater Treatment Unit

34 [LAC 33:III.5107.A.2]

Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### EQT 0277 13 - Acid Plant Caustic Scrubber

35	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to
11	<b></b> . <b>_</b>	show annual potential sulfur dioxide emissions.
36	[LAC 33:III.501.C.6]	pH >= 6 s.u. when venting to scrubber. STATE ONLY.
	e e e	Which Months: All Year Statistical Basis: One-hour average
37	[LAC 33:III.501.C.6]	pH recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
38	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device continuously only when venting to scrubber. STATE ONLY.
	,	Which Months: All Year Statistical Basis: One-hour average
39	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
40	[LAC 33:III.501.C.6]	Flow rate >= 315 gallons/min when venting to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: One-hour average
41	[LAC 33:III.501.C.6]	pH monitored by pH instrument continuously only when venting to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
42	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
· 43	[LAC 33:III.905]	Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a
		property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the
	•	facilities, even though the ambient air quality standards in affected areas are not exceeded.

## FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

44 [40 CFR 65.143(a)(1)]	Ensure that each closed vent system is designed and operated to collect the regulated material vapors from the emission point and to route the
-	collected vapors to a control device. Subpart G. [40 CFR 65.143(a)(1)]
45 [40 CFR 65.143(a)(2)]	Operate closed vent systems at all times when emissions are vented to them. Subpart G. [40 CFR 65.143(a)(2)]

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

# Group: PCS 0001 Spent Acid Process

# FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

46 [40 CFR 65.143(a)(3)(ii)] Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained	
46 [40 CFR 65.143(a)(3)(ii)] Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained and the vent stream is not diverted through the bypass line. Subpart G. [40 CFR 65.143(a)(3)(ii)]	l in the non-diverting position
Which Months: All Year Statistical Basis: None specified	
47 [40 CFR 65.143(a)(3)(ii)] Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Sub-	bnort G (40 CEP
65.143(a)(3)(ii)]	opan G. [40 CFR
48 [40 CFR 65.143(b)(1)(i)(A)] Closed vent system (hard piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation	o's specified frequency on
specified in 40 CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(i)(A)]	is specified frequency, as
Which Months: All Year Statistical Basis: None specified	
49 [40 CFR 65.143(b)(1)(i)(B)] Closed vent system (hard piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subjectively	mart G I/O CER
65.143(b)(1)(i)(B)]	part G. [40 Cl IC
Which Months: All Year Statistical Basis: None specified	
50 [40 CFR 65.143(b)(1)(ii)] Closed vent system (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and	annually, as specified in 40
CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(ii)]	,, op 0011100 111 10
Which Months: All Year Statistical Basis: None specified	
51 [40 CFR 65.143(b)(2)(i)] Closed vent system (unsafe to inspect): Determine that the equipment is unsafe to inspect because inspecting person	onnel would be exposed to an
imminent or potential danger as a consequence of complying with 40 CFR 65.143(b)(1). Comply with this require	
requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(i)]	
52 [40 CFR 65.143(b)(2)(ii)] Closed vent system (unsafe to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regu	
Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-monito	
frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subp	part G. [40 CFR
65.143(b)(2)(ii)]	
Which Months: All Year Statistical Basis: None specified	
53 [40 CFR 65.143(b)(3)(i)] Closed vent system (difficult to inspect): Determine that the equipment cannot be inspected without elevating the i	
2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 65	6.143(b)(1). Subpart G. [40
CFR 65.143(b)(3)(i)]	
54 [40 CFR 65.143(b)(3)(ii)] Closed vent system (difficult to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once eve	ery five years. Comply with
this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(ii)]	
Which Months: All Year Statistical Basis: None specified  55 [40 CFR 65.143(d)(1)] Closed vent system: Eliminate indications of a leak, or monitor the equipment according to the provisions in 40 Closed vent system: Closed vent system: Eliminate indications of a leak, or monitor the equipment according to the provisions in 40 Closed vent system: Eliminate indications of a leak, or monitor the equipment according to the provisions in 40 Closed vent system: Eliminate indications of a leak, or monitor the equipment according to the provisions in 40 Closed vent system:	ED 65 142(a) if there are
visible, audible or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 65	
[40 CFR 65.143(d)(1)]	7.143(b)(1)(l)(B). Subpart G.
56 [40 CFR 65.143(d)(2)] Closed vent system: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and con	mulete renairs no later than 15
calendar days after each leak is detected or at the beginning of the next introduction of vapors to the system, which	
specified in 40 CFR 65.143(d)(3). Subpart G. [40 CFR 65.143(d)(2)]	

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Al ID: 1314 - Rhodia Inc

Activity Number: PER20120011
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Air - Title V Regular Permit Minor Mod

## Group: PCS 0001 Spent Acid Process

## FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

57	[40 CFR 65.143(d)(3)]	Closed vent system: Complete repairs as soon as practical, but not later than the end of the next closed vent system shutdown, if repair of a leak
	•	is technically infeasible without a closed vent system shutdown, or if it is determined that emissions from immediate repair would be greater than
	• •	the emissions likely to result from delay of repair. Subpart G. [40 CFR 65.143(d)(3)]
58	[40 CFR 65.163]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
		specified in 40 CFR 65 163(a) through (e), as applicable. Subpart G.
59	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to
		show annual potential sulfur dioxide emissions.
60	[LAC 33:III.5107.A.2]	Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than

or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

## PCS 0001 Spt-Proc - Spent Acid Process

Group Members: ARE 0002 CRG	CRG	EQT 0008EQT 0150EQT 0151EQT 0161EQT 0163EQT 0164EQT 0165EQT 0167EQT 0168EQT 0169EQT 0171EQT 0176EQT 0185EQT 0277FUG 0002
0003	0004	2,000,000

The total emissions of all pollutants listed for Process Group Spt-Proc (PCS 0001) in the table "Emission Rates for TAP/HAP & Other Pollutants" shall not exceed 0.56 tons/year. These emissions shall be calculated and recorded annually, both for each individual pollutant and the sum. These records shall be kept onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 0.56 tons/year for the sum of Spt-Proc pollutants in any calendar year shall be a violation of this permit and must be

reported to the Office of Environmental Compliance, Enforcement Division.

## Group: PCS 0002 TS Process

Group Members: ARE 0003 CRG CRG EQT 0147 EQT 0177 EQT 0178 EQT 0180 EQT 0181 EQT 0182 EQT 0183 EQT 0278 EQT 0278 EQT 0280 EQT 0281 EQT 0282 EQT 0283 EQT 0284 FUG 0003 RLP 0013 RLP 0014

# ARE 0003 M3 - Treatment Services Sumps

62 [LAC 33:III.5107.A.2] Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

## CRG 0001 CRG001 - 40D250, 40D280, and 40D200

Group Members: EQT 0177 EQT 0178 EQT 0180

63 [40 CFR 60.112b(a)(3)(i)]

Closed vent system: Design to collect all VOC vapors and gases discharged from the storage vessel. Subpart Kb. [40 CFR 60.112b(a)(3)(i)]

the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1

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# Group: PCS 0002 TS Process

## CRG 0001 CRG001 - 40D250, 40D280, and 40D200

	100200,	tobaco, and tobaco
64	[40 CFR 60.112b(a)(3)(ii)]	VOC, Total >= 95 % reduction efficiency using a closed vent system and control device. Sulfuric Acid Unit No. 2 serves as the primary control device for these tanks. The TS Vapor Combustor serves as the secondary control device for these tanks. Subpart Kb. [40 CFR]
		60.112b(a)(3)(ii)]
		Which Months: All Year Statistical Basis: None specified
65	[40 CFR 60.116b(b)]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimension of
		the storage vessel and an analysis showing the capacity of the storage vessel. Keep copies of all records for the life of the source as specified by 40 CFR 60.116b(a). Subpart Kb. [40 CFR 60.116b(b)]
66	[40 CFR 61.343(a)(1)(i)(A)]	Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading
		less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR
	:	61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
67	[40 CFR 61.343(a)(1)(i)(B)]	Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening
		for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart
		FF. [40 CFR 61.343(a)(1)(i)(B)]
68	[40 CFR 61.343(a)(1)]	Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart
		FF. [40 CFR 61.343(a)(1)]
69	[40 CFR 61.343(c)]	Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure
		that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF, [40 CFR 61.343(c)]
	<u></u>	Which Months: All Year Statistical Basis: None specified
70	[40 CFR 61.343(d)]	Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified,
	540 GPD 64 0 404 1411	or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
>	[40 CFR 61.349(a)(1)(iii)]	Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
72	[40 CFR 61.355]	Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as
		applicable. Subpart FF.
73	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40
		CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two
74	140 CPD 42 1224-V0V01	years from the date the information is recorded unless otherwise specified. Subpart FF.
74	[40 CFR 63.133(a)(2)(i)]	Operate and maintain a fixed roof and a closed-vent system that routes the organic hazardous air pollutants vapors vented from the wastewater
75	[40 CFR 63.133(b)(1)(i)]	tank to a control device. Subpart G. [40 CFR 63.133(a)(2)(i)]
/3	[40 CFK 63.133(B)(1)(I)]	Fixed roof: Maintain in accordance with the requirements specified in 40 CFR 63.148, except as provided in 40 CFR 63.133(b)(4). Subpart G.
76	[40 CFR 63.133(b)(1)(ii)]	[40 CFR 63.133(b)(1)(i)] Fixed roof. Maintain both association at all times that the
70	[40 0. 10 03.133(0)(1)(11)]	Fixed roof: Maintain each opening in a closed position at all times that the wastewater tank contains a Group I wastewater stream or residual
		removed from a Group 1 wastewater stream except when it is necessary to use the opening for wastewater sampling, removal, or for equipment
		inspection, maintenance, or repair. Subpart G. [40 CFR 63.133(b)(1)(ii)]

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

## Group: PCS 0002 TS Process

83 [LAC 33:III.2103.I]

CRG	0001 CRG001 - 40D250,	40D280, and 40D200
77	[40 CFR 63.133(f)]	Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work
		practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]
		Which Months: All Year Statistical Basis: None specified
78	[40 CFR 63.133(g)]	Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for
		control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3).
		Subpart G. [40 CFR 63.133(g)]
	•	Which Months: All Year Statistical Basis: None specified
79	[40 CFR 63.143(a)]	Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]
80	[LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine
		maintenance which may not exceed 240 hours per year.
	•	Which Months: All Year Statistical Basis: None specified
81	[LAC 33:III.2103.E]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor
		disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or
		sampling is taking place. Routed to Sulfuric Acid Unit No. 2 or TS Vapr Combustor.
82	[LAC 33:III,2103.H,2]	Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.

## CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220

specified in LAC 33:III 2103.I.1 - 7, as applicable.

#### Group Members: EQT 0179 EQT 0181 EQT 0182 EQT 0183

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84	[40 CFR 61.343(a)(1)(i)(A)]	Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading
		less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR
		61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
85	[40 CFR 61.343(a)(1)(i)(B)]	Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening
		for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart
	•	FF. [40 CFR 61.343(a)(1)(i)(B)]
86	[40 CFR 61.343(a)(1)]	Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart
		FF. [40 CFR 61.343(a)(1)]
87	[40 CFR 61.343(c)]	Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure
		that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF, [40 CFR 61.343(c)]
		Which Months: All Year Statistical Basis: None specified
88	[40 CFR 61.343(d)]	Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified,
		or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF, [40 CFR 61.343(d)]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information

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Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

#### Group: PCS 0002 TS Process

CRG 0002	CRG002 - 40D290,	40D210, 40D300	, and 40D220
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89	[40 CFR 61.349(a)(1)(iii)]	Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
90	[40 CFR 61.355]	Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
91	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
92	[40 CFR 63.133(a)(1)]	Operate and maintain a fixed roof. Subpart G. [40 CFR 63.133(a)(1)]
93	[40 CFR 63.133(f)]	Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]
94	[40 CFR 63.133(g)]	Which Months: All Year Statistical Basis: None specified Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]  Which Months: All Year Statistical Basis: None specified
95	[40 CFR 63.143(a)]	Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]
96	[LAC 33:III.2103.A]	Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
97	[LAC 33:III.2103.H.3]	If required, Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
98	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

#### EQT 0147 21 - TS Vapor Combustor

99	[40 CFR 60.112b(a)(3)(ii)]	VOC, Total >= 95 % reduction efficiency using a closed vent system and control device. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)]
100	[40 CFR 60.113b(c)(2)]	Which Months: All Year Statistical Basis: Three-hour average
100	[40 CFR 60.1136(C)(2)]	Equipment/operational data monitored by the regulation's specified method(s) at the regulation's specified frequency. Monitor the parameters of
		the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of
		this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
		Which Months: All Year Statistical Basis: None specified
101	[40 CFR 60.115b(c)(1)]	Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
102	[40 CFR 60.115b(c)(2)]	Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2)
		Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

#### Group: PCS 0002 TS Process

#### EQT 0147 21 - TS Vapor Combustor

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103	[40 CFR 61.349(a)(2)(i)(C)]	Residence time >= 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F). Subpart FF. [40 CFR 61.349(a)(2)(i)(C)] Which Months; All Year Statistical Basis: None specified
104	[40 CFR 61.349(f)]	Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
105	[40 CFR 61.354(e)(1)]	Which Months: All Year Statistical Basis: None specified Temperature monitored by temperature monitoring device continuously. Install the temperature sensor at a representative location in the combustion chamber. Subpart FF. [40 CFR 61.354(c)(1)] Which Months: All Year Statistical Basis: None specified
106	[40 CFR 61.354(c)]	Inspect the firebox temperature results daily to ensure proper operation. Subpart FF. [40 CFR 61.354(c)]
107	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
108	[40 CFR 63.139(b)]	Ensure that the control device is operating whenever organic hazardous air pollutants emissions are vented to the control device. Subpart G. [40 CFR 63.139(b)]
109	[40 CFR 63.139(c)(1)(iii)]	Residence time >= 0.5 sec at a minimum temperature of 760 degrees C. The TS Vapor Combustor is the secondary control device for TS tanks that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.139(c)(1)(iii)] Which Months: All Year Statistical Basis: None specified
110	[40 CFR 63.139(d)]	Demonstrate that each control device or combination of control devices achieves the appropriate conditions specified in 40 CFR 63.139(c) by using one or more of the methods specified in 40 CFR 63.138(d)(1), (d)(2), or (d)(3), except as specified in (d)(4). Subpart G. [40 CFR 63.139(d)]
111	[40 CFR 63.143(e)(1)]	Comply with the monitoring requirements specified in 40 CFR 63 Subpart G Table 13. Continuously monitor the firebox temperature. Subpart G. [40 CFR 63.143(e)(1)]
112	[40 CFR 63.143(g)]	The firebox temperature monitoring equipment shall be installed, calibrated, and maintained according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment will monitor accurately. Subpart G. [40 CFR 63.143(g)]
113	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
114	[LAC 33:III.1311.C]	Which Months: All Year Statistical Basis: None specified  Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
115	[LAC 33:III.1513.C]	Which Months: All Year Statistical Basis: Six-minute average Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

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#### Group: PCS 0002 TS Process

#### EQT 0147 21 - TS Vapor Combustor

116	[LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95%. This
	•	limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year
		Which Months: All Year Statistical Basis: Three-hour average
117	[LAC 33:III.2103.H.2]	Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
118	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
119	[LAC 33:III.5107.A.2]	Emits Class III TAP (via this source and process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### EQT 0278 U1-Scbr - Unit 1 Tail Gas Scrubber

120 [LAC 33:III.905]	Install air pollution control facilities whenever practically, economically, and technologically feasible. When facil
•	Parameter Production with the production of production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the production of the prod
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ties have been installed on a them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

#### EQT 0279 U2-Scbr - Unit 2 Tail Gas Scrubber

121 [LAC 33:III.905]	Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a
	property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected gross are not even de-

#### EQT 0280 U1-Furn - Unit 1 Furnace

122	40 CFR 61.342(e)(1)(i)]	Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment
123	[40 CFR 61.348(e)]	system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]  Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the
·		methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC 33:III.507.H.1.a]
124	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two
125	[40 CFR 63.138(h)(2)(i)]	years from the date the information is recorded unless otherwise specified. Subpart FF.  Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H.  Subpart G. [40 CFR 63.138(h)(2)(i)]

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

#### Group: PCS 0002 TS Process

#### EQT 0280 U1-Furn - Unit 1 Furnace

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126	[40 CFR 65.145(a)]	The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan
		remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control
	•	device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]
127	[40 CFR 65.145(c)(1)]	Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper
	•	operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65.
		Subpart G. [40 CFR 65.]45(c)(1)]
128	[40 CFR 65.145(c)(1)]	Temperature >= 1500 F when spent acid tanks are venting to Sulfuric Acid Unit No. 1. Subpart G. [40 CFR 65.145(c)(1)]
		Which Months: All Year Statistical Basis: None specified
129	[40 CFR 65,145(c)(2)]	The owner or operator shall monitor the parameters specified in the Initial Compliance Status Report or in the operating permit. Therefore,
		Combustion zone temperature shall be monitored. Records shall be generated as specified in 65.163(b)(1). [40 CFR 65.145(c)(2)]
130	[40 CFR 65.163]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
	· · · · · · · · · · · · · · · · · · ·	specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
131	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60
	[	consecutive minutes.
		Which Months: All Year Statistical Basis: None specified

EQT	0281 U2-RFurn - Unit 2	Regen Furnace
132	[40 CFR 60.112b(a)(3)(ii)]	VOC, Total >= 95 % reduction efficiency. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)] Which Months: All Year Statistical Basis: Three-hour average
133	[40 CFR 60.113b(c)(2)]	Equipment/operational data monitored by the regulation's specified method(s) continuously. Monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature (Regen furnace) continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
		Which Months: All Year Statistical Basis: None specified
134	[40 CFR 60.115b(c)(1)]	Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment, Subpart Kb. [40 CFR 60.115b(c)(1)]
135	[40 CFR 60.115b(c)(2)]	Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2). Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]
136	[40 CFR 61.342(c)(1)(i)]	Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
137	[40 CFR 61.348(e)]	Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC 33:III.507.H.1.a]

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#### Group: PCS 0002 TS Process

EQT (	0281 U2-RFurn - Unit 2 I	Regen Furnace
138	[40 CFR 61.349(a)(2)(i)(C)]	Residence time >= 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F) in the Regen furnace. Subpart FF. [40 CFR 61.349(a)(2)(i)(C)]
139	[40 CFR 61.349(f)]	Which Months: All Year Statistical Basis: None specified Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
140	[40 CFR 61.354(e)(5)]	Which Months: All Year Statistical Basis: None specified Equipment/operational data monitored by technically sound method continuously. Monitor a parameter that indicates good combustion operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]
141	[40 CFR 61.354(c)(5)]	Which Months: All Year Statistical Basis: None specified Equipment/operational data recordkeeping by recorder continuously. Record a parameter that indicates good combustion operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]
142	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two
143	[40 CFR 63.138(h)(2)(i)]	years from the date the information is recorded unless otherwise specified. Subpart FF.  Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H.
144	[40 CFR 63.139(c)(1)(iii)]	Subpart G. [40 CFR 63.138(h)(2)(i)] Route organic hazardous air pollutant emissions to an enclosed combustion device having a minimum Residence time >= 0.5 sec at a minimum temperature of 760 degrees C. Unit No. 2 Regen furnace is the primary control device for TS tanks that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to us. Per 63.139(d)(4)(iii)(A), this unit is exempt from 63.139(d)(1)-(3) and 63.143. Subpart G. [40 CFR 63.139(c)(1)(iii)]
145	[LAC 33:III.1101.B]	Which Months: All Year Statistical Basis: None specified  Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
146	[LAC 33:III.2103.E.1]	Which Months: All Year Statistical Basis: None specified VOC, Total >= 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95% for compliance of all tanks vented to it. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
	[LAC 33:111.2103.H.2] [LAC 33:111.2103.1]	Which Months: All Year Statistical Basis: Three-hour average Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate. Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

#### EQT 0282 U2-SFurn - Unit 2 Sulfur Furnace

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

#### Group: PCS 0002 TS Process

152 [LAC 33:III.5109.A.1]

160 [40 CFR 61.348(e)(3)ii]

EQT 0282 U2-SFurn - Unit 2 Sulfur Furnace

149 [LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  Which Months: All Year Statistical Basis: None specified
EQT 0283 U1-Proc - Unit 1	Process
150 [LAC 33:III.1511.E]	Production of Sulfuric acid monitored by technically sound method daily. Monitor the H2SO4 production rate.  Which Months: All Year Statistical Basis: None specified
[51 [LAC 33:III.1513.A.3]	Production of Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H2SO4 production rate.

MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

#### EQT 0284 U2-Proc - Unit 2 Process

<u>LWI</u>	0204 02-F10C - OHIL 2 F10	CESS
153	[LAC 33:JII.1511.E]	Sulfuric acid monitored by technically sound method daily. Monitor the H2SO4 production rate.  Which Months: All Year Statistical Basis: None specified
154	[LAC 33:III.1513.A.3]	Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H2SO4 production rate.
155	[LAC 33:III.5109.A.1]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.  MACT applies for metals only and therefore is determined to be compliance with the BIF permit.
		MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

156	[40 CFR 60.112b(a)(3)(1)]	Closed vent system (no detectable emissions): VOC, 1 otal < 500 ppm above background as indicated by instrument readings and visual
		inspections, as determined in Subpart VV, 40 CFR 60.485(c). Subpart Kb. [40 CFR 60.112b(a)(3)(i)]
		Which Months: All Year Statistical Basis: None specified
157	[40 CFR 60.112b(a)(3)]	Equip with a closed vent system and control device. Design the closed vent system to collect all VOC vapors and gases discharged from the
	•	storage vessel and operate with no detectable emissions. Subpart Kb. [40 CFR 60.112b(a)(3)]
158	[40 CFR 61.343(a)(1)(i)(A)]	Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading
		less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR
		61.355(h). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
159	[40 CFR 61.345(a)(1)]	Install, operate, and maintain a cover on each container used to handle, transfer, or store waste. Subpart FF. [40 CFR 61.345(a)(1)]

Install, operate, and maintain a cover on each container used to handle, transfer, or store waste. Subpart FF. [40 CFR 61.345(a)(1)]

If the cover and closed-vent system operates such that the treatment process and wastewater treatment system unit are maintained at a pressure less than atmospheric pressure, the owner or operator may operate the system with an opening that is not sealed and kept closed at all times provided the opening is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h). Subpart FF. [40 CFR 61.348(e)(3)ii]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

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#### Group: PCS 0002 TS Process

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

100	2003 100-13 - Healiff	ent Services Fugitive Emissions
161	[40 CFR 61.349(a)(1)(i)]	Closed-vent system: Operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.349(a)(1)(i)]
162	[40 CFR 61.349(f)]	Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of
		ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose
		connections. Subpart FF. [40 CFR 61.349(f)]
		Which Months: All Year Statistical Basis: None specified
163	[40 CFR 61.354(f)(1)]	Closed-vent system (bypass line): Seal or closure mechanism monitored by visual inspection/determination monthly. Check the position of the
	, , , , , ,	valve and the condition of the car-seal or closure mechanism required under 40 CFR 61.349(a)(1)(ii) to ensure that the valve is maintained in the
		closed position and the vent stream is not diverted through the bypass line. Subpart FF. [40 CFR 61.354(f)(1)]
		Which Months: All Year Statistical Basis: None specified
164	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40
		CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two
		years from the date the information is recorded unless otherwise specified. Subpart FF.
165	[40 CFR 63.148(c)(1)]	Conduct initial inspection of closed vent system on TS tanks in accordance with Method 21 as specified in 40 CFR 63.148(c)(1). Conduct
		annual inspection for visible, audible, or olfactory indications of leaks. This requirement only applies if/when notice is received from a customer
		that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(c)(1)]
166	[40 CFR 63.148(f)(2)]	Vapor collection system or closed vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly
	•	to ensure the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. This requirement only applies
		if/when notice is received from a customer that a HON Group I wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR
		63.148(f)(2)]
		Which Months: All Year Statistical Basis: None specified
167	[40 CFR 63.148(f)(2)]	Vapor collection system or closed vent system (bypass lines): Secure the bypass line valve in the closed position with a car-seal or a lock-and-
		key type configuration. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewater or residual
		has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
168 :	[40 CFR 63.148(i)]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
•	•	specified in 40 CFR 63.148(i)(1) through (i)(6). This requirement only applies if/when notice is received from a customer that a HON Group 1
1.00	[40 CED (0.140())]	wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(i)]
109	[40 CFR 63.148(j)]	Submit the information specified in 40 CFR 63.148(j)(1) through (j)(3) with the reports required by 40 CFR 63.182(b) of subpart H or 40 CFR
		63.152(c). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been
170	ET A C 22-TH 5013	shipped to Rhodia. Subpart G. [40 CFR 63.148(j)]
170	[LAC 33:III.501]	Comply with 40 CFR 264 BB and 40 CFR 61 Subpart V by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines.
171	[T A C 22-HI 5107 A 21	Compliance is achieved through compliance with LA MACT Determination for nonHON Sources.
1 / 1	[LAC 33:III.5107.A.2]	Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER
	•	(facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in
		the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

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#### Group: PCS 0002 TS Process

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

		it Services rugitive Emissions
172	[LAC 33:III.5109.A]	Pressure relief device in gas/vapor service: VOC, Total < 500 ppm except during pressure releases, as measured by the method specified in Section P.3, as specified in Section F.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
	:	Which Months: All Year Statistical Basis: None specified
173	[LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (percent leaking valves <= 2 for two consecutive semiannual leak detection periods):  VOC, Total monitored by the regulation's specified method(s) annually, as specified in Paragraph J.2.b of the Louisiana MACT Determination  for Non-HON Equipment Look (Morch 20, 1005). Monitor using the method graphfied in Section B. If the paragraph and looking in
		for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is
•		greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Optional alternative to quarterly monitoring.  Which Months: All Year Statistical Basis: None specified
174	[LAC 33:III.5109.A]	Comply with the test methods and procedures in Section P, as specified in Subsections P.1 through P.5 of the Louisiana MACT Determination
.,-		for Non-HON Equipment Leaks (March 30, 1995).
175	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service (opened or otherwise had the seal broken): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had
		the seal broken, including those determined to be unrepairable prior to process unit shutdown, as specified in Paragraph O.8.a of the Louisiana
		MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9, unless it is determined to be unrepairable, in which case it is
	i de la companya de la companya de la companya de la companya de la companya de la companya de la companya de	counted as unrepairable.
	· <b>.</b>	Which Months: All Year Statistical Basis: None specified
176	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in VOTAP service and, if the pump is covered by standards under NSPS, is not in VOC service, as specified in Paragraph D.4.b of the Louisiana MACT Determination for Non-HON Equipment
		Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
177	[LAC 33:III.5109.A]	Delay of Repair: Repair equipment before the end of the next process unit shutdown, if repair is technically infeasible without a process unit shutdown, as specified in Subsection M.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
178	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Equip each barrier fluid system with a sensor that will detect failure of the seal
	(======================================	system, the barrier fluid system, or both, as specified in Paragraph D.4.c of the Louisiana MACT Determination for Non-HON Equipment Leaks
		(March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
179	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service (welded completely around the circumference of the interface or physically removed
		and the pipe welded together): Equipment/operational data monitored by the regulation's specified method(s) within three months after being
		welded. Check the integrity of the weld by monitoring according to the procedures in Section P or by testing using x-ray, acoustic monitoring,
	•	hydrotesting, or other applicable method, as specified in Subsection O.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks
		(March 30, 1995). Comply with this requirement instead of the requirements in Subsection O.
		Which Months: All Year Statistical Basis: None specified

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#### Group: PCS 0002 TS Process

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

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180	[LAC 33:111.5109.A]	Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: VOC, Total monitored by the regulation's specified method(s) within 5 days of finding evidence of a potential leak by visual, audible, olfactory, or any other detection method, as specified in Section K.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 10000 ppm or greater for agitators, 2000 ppm or greater for pumps or 1000 ppm or greater for valves, connectors, instrument systems, or pressure relief devices is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection K.3.  Which Months: All Year Statistical Basis: None specified
181	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service: Repair Leaks as soon as practicable, but not later than 15 calendar days after a leak is
		detected, except as provided in Subsection O.8. Make a first attempt at repair no later than 5 calendar days after each leak is detected. If a leak
		is detected, monitor the for leaks within the first 90 days after its repair, as specified in Subsection O.9 of the Louisiana MACT Determination
		for Non-HON Equipment Leaks (March 30, 1995).
182	[LAC 33:III.5109.A]	Pressure relief device in gas/vapor service: After each pressure release, return to a condition of no leakage, as indicated by an instrument reading
		of less than 500 ppm, as soon as practicable, but no later than five calendar days after each pressure release, except as provided in Section M, as
		specified in Section F 2.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
183	[LAC 33:III.5109.A]	Identify each piece of equipment in a process unit subject to this MACT determination such that it can be distinguished readily from equipment
		that is not subject to this MACT determination, as specified in Subsection C.3 of the Louisiana MACT Determination for Non-HON Equipment
		Leaks (March 30, 1995).
184	[LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (skip period leak detection and repair): Notify DEQ 30 days before implementing any of
		the alternate provisions of Section J, as specified in Subsection R.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks
		(March 30, 1995).
185	[LAC 33:III.5109.A]	Sampling connection systems: Equip with a closed-purge system or closed-vent system, except as provided for in Section C, as specified in
		Subsection G.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Ensure that this system collects or
		captures the sample purge for return to the process.
186	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service (percent of leaking connectors > 2): VOC, Total monitored by the regulation's
		specified method(s) quarterly until good performance is obtained or until four quarterly monitorings have been performed, as specified in
	•	Subsections O.2 and O.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If good performance has
		not been obtained after four quarters of monitoring, monitor the remaining unchecked connectors within six months of the last quarterly
		monitoring period, as specified in Subsection O.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If
		monitoring of the remaining connectors indicates good performance, monitor in accordance with Subsection O.4. If monitoring of the remaining
		connectors indicates that good performance has not been obtained, monitor in accordance with Subsection O.5. Monitor using the method
		specified in Section P. If an instrument reading >= 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions
		specified in Subsection O.9, except as provided in Section M.
		Which Months: All Year Statistical Basis: None specified

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#### Group: PCS 0002 TS Process

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

rug	0003 FOG-19 - Treatm	ent Services Fugitive Emissions
187	[LAC 33:III.5109.A]	Pumps in light liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection D.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
. 188	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service: Calculate the percent leaking connectors using the equation in Subsection O.12 for use in determining the monitoring frequency, as specified in Subsection O.12 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
189	[LAC 33:III.5109.A]	Pumps in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly. Monitor to detect leaks using the methods specified in Subsection P.2, except as provided in Subsection C.4 and Subsections D.4, D.5, and D.6, as specified in Paragraph D.1.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If an instrument reading of 2000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate repair provisions as specified in Subsection D.3.
190	[LAC 33:III.5109.A]	Which Months: All Year Statistical Basis: None specified Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection K.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no
191	[LAC 33:III.5109.A]	later than 5 calendar days after each leak is detected.  Submit report: Due semiannually starting six months after the initial report required in Subsection R.1. Include the information specified in Paragraphs R.2.a through R.2.e, as specified in Subsection R.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
192	[LAC 33:III.5109.A]	Open-ended valves or lines: Monitor and repair in accordance with Section I, as specified in Subsection H.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
193	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Equipment/operational data monitored by visual inspection/determination daily, if pump is in service. Check sensor daily or equip with an audible alarm, as specified in Subparagraph D.4.e.i of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined in Paragraph D.4.e.ii, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1. Which Months: All Year Statistical Basis: None specified
194	[LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (difficult-to-monitor): VOC, Total monitored by the regulation's specified method(s) at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valve at least once per calendar year, as specified in Subsection I.6.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. Comply with this requirement instead of the requirements in Subsection I.1.  Which Months: All Year Statistical Basis: None specified
195	[LAC 33:III.5109.A]	VOC, Total recordkeeping by logbook within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled. Maintain records as required in Subsection Q.5, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

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#### Group: PCS 0002 TS Process

FUG 0	0003 FUG-TS - Treatn	nent Services Fugitive Emissions
	[LAC 33:III.5109.A]	Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve that seals the open end at all times except during operations
		requiring process fluid flow through the open-ended valve or line or during maintenance and repair, as specified in Subsection H.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
197	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service (percent of leaking connectors <= 2): VOC, Total monitored by the regulation's
		specified method(s) annually, as specified in Subsections O.2 and O.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks
·		(March 30, 1995). Annual monitoring shall be performed per the Louisiana Fugitive Emission Program Consolidation Guidelines which states as once every four quarters. Monitor using the method specified in Section P. If an instrument reading >= 1000 ppm is measured, a leak is
		detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
100	FI A C 22-171 C100 A1	Which Months: All Year Statistical Basis: None specified
198	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), if nump is in service, as specified in Personal D. 4 dof the Louisians MACT Determination for New YOME minutes at 1995.
	•	if pump is in service, as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).  If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in
		Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
199	[LAC 33:III.5109,A]	Which Months: All Year Statistical Basis: None specified
199	[LAC 33:III.3109,A]	Pressure relief device in gas/vapor service: VOC, Total monitored by the regulation's specified method(s) within 5 days (calendar) after the pressure release to confirm the condition of no leakage, as indicated by an instrument reading of less than 500 ppm above background, as
		specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method
		specified in Subsection P.3.
200	[LAC 33:III.5109,A]	Which Months: All Year Statistical Basis: None specified
200	[A, corm.cc ovar	Open-ended valves or lines (equipped with a second valve): Operate in a manner such that the valve on the process fluid end is closed before the second valve is closed, as specified in Subsection H.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
201	[LAC 33:III.5109.A]	Sampling connection systems (closed-purge or closed-vent system): Return the purged process fluid directly to the process line with zero
		VOTAP emissions to the atmosphere, or collect and recycle the purged process fluid with zero VOTAP emissions to the atmosphere, or be
		designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of Section N,
202	[LAC 33:III.5109.A]	as specified in Subsection G.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).  Valves in gas/vapor service and in light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating
		the monitoring personnel more than two meters above a support service, as specified in Subsection I.6.a of the Louisiana MACT Determination
000	FT 4.07.00 TYY 51.00 4.7	for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.1.
203	[LAC 33:III.5109.A]	Attach a weatherproof and readily visible identification, marked with the equipment identification, to leaking equipment, as specified in Subsection Q.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
204	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, a criterion
		that indicates failure of the seal system, the barrier fluid system, or both, as specified in Subparagraph D.4.e.ii of the Louisiana MACT
		Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.

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#### Group: PCS 0002 TS Process

FUG 0003	FUG-TS - Trea	tment Services	Fugitive En	nissions
		and the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second s		

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the inf specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Non-H Equipment Leaks (March 30, 1995).  Valves in gas/vapor service and in light liquid service (percent leaking valves >= 4): VOC, Total monitored by the regulation's specified in Subsection I.7 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, Monitor using the method specified in Subsection P.2. Initiate monitoring within 60 days of the previous monitoring and continuous the percent of leaking valves is less than 4, at which time monitoring can be performed in accordance with Subsection I.1.  Which Months: All Year Statistical Basis: None specified  Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.  Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater that stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device the with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emiss atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995) with this requirement instead of the requirements in Subsection D.1.	
Valves in gas/vapor service and in light liquid service (percent leaking valves >= 4): VOC, Total monitored by the regulation's specimethod(s) monthly, as specified in Subsection I.7 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, Monitor using the method specified in Subsection P.2. Initiate monthly monitoring within 60 days of the previous monitoring and conthe percent of leaking valves is less than 4, at which time monitoring can be performed in accordance with Subsection I.1. Which Months: All Year Statistical Basis: None specified  Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HOE Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.  Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater that stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device the with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emiss atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).	
Which Months: All Year Statistical Basis: None specified  Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HO Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.  Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater that stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device the with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emiss atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).	995).
Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HO Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected. Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater that stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device the with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emiss atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).	
detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HO. Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected. Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater that stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device the with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emiss atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).	
Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater that stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device the with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emiss atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 199).	ak is
with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emiss atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 199).	
The state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the s	ons to the
VOC, Total monitored by technically sound method within 90 days of placing equipment back in service that had been physically renservice, disassembled or dismantled to determine if it is leaking, as specified in Subsection C.5 of the Louisiana MACT Determination HON Equipment Leaks (March 30, 1995).  Which Months: All Year Statistical Basis: None specified	ved from for Non-

#### RLP 0013 2 - Sulfuric Acid Unit No. 2

IXILI	VO 13 2 - Sumuric Acid Off	R NO. 2
210	[40 CFR 60.83(a)(1)]	Acid mist <= 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H2SO4, the production being expressed as 100% H2SO4. Subpart H. [40 CFR 60.83(a)(1)]
		Which Months: All Year Statistical Basis: None specified
211	[40 CFR 60.83(a)(2)]	Opacity < 10 percent. Subpart H. [40 CFR 60.83(a)(2)]
		Which Months: All Year Statistical Basis: None specified
212	[40 CFR 60.85(a)]	Use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR
	· · · · · · · · · · · · · · · · · · ·	60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.85(a)]
213	[40 CFR 60.85(b)]	Determine compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and procedures
		specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]
214	[40 CFR 60.Subpart H]	Rhodia shall comply with the monitoring requirements for SO2 set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F,
		except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
215	[40 CFR 60.Subpart H]	Rhodia shall comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H, Appendix B and
		Appendix F.
		- Fk

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#### Group: PCS 0002 TS Process

RLP 0	013	2 -	Sulfuric	Acid	<b>Unit No</b>	. 2

216	[40 CFR 60.Subpart H]	Rhodia shall comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and
		Appendix F.
217	[40 CFR 60.Subpart H]	Shall meet a 365-day rolling average limit of 2.2 lbs. of SO2 per ton of 100% sulfuric acid produced, averaged over all operating hours in a
		rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all
		periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on January 1, 2011 and
		demonstrate compliance by January 1, 2012.)
		Which months: All year Statistical Basis: 365-day rolling average.
218	[40 CFR 60.Subpart H]	Shall meet a limit of 3 0 lbs SO2/ton, expressed as lbs. of SO2 emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-
		hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and
		shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Shutdown is
		the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.
219	[LAC 33:III.501.C.6]	Rhodia shall install continuous emission monitors (CEMs) for NOx as part of the debottlenecking project. STATE ONLY,
220	[LAC 33:III.5107.A.2]	Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under
		LAC 33:III.5105.B.
	-	

#### RLP 0014 3 - Sulfuric Acid Unit No. 1

RLP (	RLP 0014 3 - Sulturic Acid Unit No. 1		
221	[40 CFR 60.83(a)(1)]	Acid mist <= 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H2SO4, the production being expressed as 100% H2SO4. Subpart H. [40 CFR 60.83(a)(1)]	
		Which Months: All Year Statistical Basis: None specified	
222	[40 CFR 60.83(a)(2)]	Opacity < 10 percent. Subpart H. Effective starting on May 1, 2012. [40 CFR 60.83(a)(2)]	
		Which Months: All Year Statistical Basis: None specified	
223	[40 CFR 60.85(a)]	Effective May 1, 2012, use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as	
		specified in 40 CFR 60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40]	
		CFR 60.85(a)]	
224	[40 CFR 60.85(b)]	Effective May 1, 2012, determine compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test	
		methods and procedures specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]	
225	[40 CFR 60.Subpart H]	Effective May 1, 2012, meet a 365-day rolling average limit of 1.9 lbs. of SO2 per ton of 100% sulfuric acid produced, averaged over all	
		operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating	
		hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring	
		on May 1, 2012 and demonstrate compliance by May 1, 2013.)	
		Which months: All year Statistical Basis: 365-day rolling average.	
226	[40 CFR 60.Subpart H]	Effective May 1, 2012, Rhodia will comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A,	
		Subpart H, Appendix B and Appendix F.	

Al ID: 1314 - Rhodia Inc

Activity Number: PER20120011
Permit Number: 0840-00033-V5
Air - Title V Regular Permit Minor Mod

#### Group: PCS 0002 TS Process

Group: PCS 0002 15 Froce	
RLP 0014 3 - Sulfuric Acid	Unit No. 1
227 [40 CFR 60.Subpart H]	Effective May 1, 2012, Rhodia will comply with the monitoring requirements for SO2 set forth in 40 CFR 60 Subpart A, Subpart H, Appendix B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
228 [40 CFR 60.Subpart H]	Effective May 1, 2012, Rhodia will comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.
229 [40 CFR 60.Subpart H]	Effective May 1, 2012, meet a limit of 3.0 lbs SO2/ton, expressed as lbs. of SO2 emissions per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas
	blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace cease.
230 [LAC 33:III.501.C.6]	Rhodia shall install continuous emission monitors (CEMs) for NOx as part of the debottlenecking project. STATE ONLY.
231 [LAC 33:III.5107.A.2]	Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
PCS 0002 TS-Proc - TS Pro	ocess
Group Members: ARE 0003 CRG 0001	CRG EQT 0147EQT 0177EQT 0178EQT 0179EQT 0180EQT 0181EQT 0182EQT 0183EQT 0278EQT 0279EQT 0280EQT 0281EQT 0282EQT 0283EQT 0284
FUG 0003 RLP 0013 RLP 0014	
232 [LAC 33:III.501.C.6]	The total emissions of all pollutants listed for Process Group TS-Proc (PCS 0002) in the table "Emission Rates for TAP/HAP & Other Pollutants" shall not exceed 2.02 tons/year. These emissions shall be calculated and recorded annually, both for each individual pollutant and the sum. These records shall be kept onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 2.02 tons/year for the sum of TS-Proc pollutants in any calendar year shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division.
EQT 0140 10 - Preheater; A	Acid Unit No. 1
233 [LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
234 [LAC 33:III.1313.C]	Which Months: All Year Statistical Basis: None specified  Total suspended particulate <= 0.6 lb/MMBTU of heat input.
235 [LAC 33:III.1513.C]	Which Months: All Year Statistical Basis: None specified Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

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EQT (	0141 11 - Lime Silos	
236	[LAC 33:III.1311.B]	Total suspended particulate <= 32.95 lb/hr using a max hourly operating rate throughput of 22.5 tons/hr. The rate of emission shall be the total of all emission points from the source.
237	[LAC 33:III.1311.C]	Which Months: All Year Statistical Basis: None specified Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  Which Months: All Year Statistical Basis: Six-minute average
EQT (	0142 12 - Oleum Loading	g Vent Scrubber
238	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy once every four hours. Applies only when venting to atmosphere. This requirement does not
239	[LAC 33:III.501.C.6]	apply during periods of planned routine maintenance on the scrubber. STATE ONLY.  Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
240	[LAC 33:III.501.C.6]	specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.  Maximum scrubber solution strength of Sulfuric acid <= 20 percent. Maximum acid strength of 20%, based on a weekly sample. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY.
241	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: Weekly maximum Flow rate monitored by flow rate monitoring device once every four hours. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
242	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: None specified  Maximum scrubber solution strength of Sulfuric acid recordkeeping by electronic or hard copy weekly. Applies only when venting to
243	[LAC 33:III.501.C.6]	atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.  Maximum scrubber solution strength of Sulfuric acid monitored by product sampling weekly. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.  Which Months: All Year Statistical Basis: Weekly maximum

#### EQT 0146 20 - Sulfur Feed Tank

245 [LAC 33:III.1513.C]

244 [LAC 33:III.501.C.6]

Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

Scrubber Flow rate >= 50 gallons/min. Based on a four-hour block average. Applies only when venting to atmosphere. This requirement does

not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the

#### EQT 0149 24 - Oleum Barge Loading Scrubber

oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY.

Which Months: All Year Statistical Basis: Four-hour average

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#### EQT 0149 24 - Oleum Barge Loading Scrubber

246	[LAC 33:III.501.C.6]	Flow rate >= 15 gallons/min when barge vents are routed to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
247	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
248	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device once every four hours when barge vents are routed to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
249	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
250	[LAC 33:III.501.C.6]	Scrubber water must be replaced after every two barges loaded. STATE ONLY.

#### EQT 0152 28 - Gasoline Storage Tank

251	[LAC 33:III.2103.A]	Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure
252	[LAC 33:III.2103.I]	greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.  Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

#### EQT 0153 6-90 - Package Boiler

<u> </u>	<u> </u>	
253	[40 CFR 60.44b(a)]	Nitrogen oxides <= 0.1 lb/MMBTU heat input (expressed as NO2), except as provided in 40 CFR 60.44b(k). The nitrogen oxide standards apply at all times, including periods of startup, shutdown, or malfunction. Subpart Db. [40 CFR 60.44b(a)]
		Which Months: All Year Statistical Basis: Thirty-day rolling average
254	[40 CFR 60.46b(c)]	Determine compliance with the NOx standards in 40 CFR 60.44b through performance testing under 40 CFR 60.46b(e) or (f), or under 40 CFR
257	[40 61 10 00.400(0)]	60.46b(g) or (h), as applicable. Subpart Db. [40 CFR 60.46b(c)]
255	[40 CED (0.40) (1.)(1.)]	
255	[40 CFR 60.48b(b)(1)]	Oxygen or Carbon dioxide recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
256	[40 CFR 60.48b(b)(1)]	Oxygen or Carbon dioxide monitored by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR
		60.48b(b)(1)]
		Which Months: All Year Statistical Basis: One-hour average
257	[40 CFR 60.48b(b)(1)]	Nitrogen oxides monitored by CMS continuously. Calculate nitrogen oxides emission rates as specified in 40 CFR 60.48b(d), except as
		provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
		Which Months: All Year Statistical Basis: One-hour average
258	[40 CFR 60.48b(b)(1)]	Nitrogen oxides recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
259	[40 CFR 60.48b(c)]	Operate NOx continuous monitoring systems and record data during all periods of operation except for continuous monitoring system
		breakdowns and repairs. Record data during calibration checks, and zero and span adjustments. Subpart Db. [40 CFR 60.48b(c)]
260	[40 CFR 60.48b(e)]	Nitrogen oxides: Follow the procedures under 40 CFR 60.13 and 40 CFR 60.48b(e)(1) through (e)(3) for installation, evaluation, and operation
_ • • •		of the NOx continuous monitoring system. Subpart Db. [40 CFR 60.48b(e)]

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#### EQT 0153 6-90 - Package Boiler

261	[40 CFR 60,48b(f)]	When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, obtain emission data by using standby monitoring systems, 40 CFR 60, Appendix A, Method 7, Method 7a, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating
262	[40 CFR 60.48b(g)]	day, in at least 22 out of 30 successive steam generating unit operating days. Subpart Db. [40 CFR 60.48b(f)]  Comply with the provisions of 40 CFR 60.48b(b), (c), (d), (e)(2), (e)(3), and (f), or monitor steam generating unit operating conditions and
263	[40 CFR 60.49b(b)]	predict nitrogen oxides emission rates as specified in a plan submitted pursuant to 60.49b(c). Subpart Db. [40 CFR 60.48b(g)] Submit the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable
264	[40 CFR 60.49b(d)]	performance specifications in 40 CFR 60 Appendix B to DEQ. Subpart Db. [40 CFR 60.49b(b)]  Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period.  Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Subpart Db. [40 CFR 60.49b(d)]
265	[40 CFR 60.49b(g)]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the information listed in 40 CFR 60.49b(g)(1) through (g)(10) for each steam generating unit operating day, except as provided under 40 CFR 60.49b(p). Subpart Db. [40 CFR 60.49b(g)]
266	[40 CFR 60.49b(h)]	Submit excess emissions report: Due by the 30th day following the end of each six-month period. Report any excess emissions which occurred during the reporting period. Subpart Db. [40 CFR 60.49b(h)]
267	[40 CFR 60.49b(i)]	Submit reports containing the nitrogen dioxide emission rate information recorded under 40 CFR 60.49b(g). Subpart Db. [40 CFR 60.49b(i)]
268	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
269	[LAC 33:III.1313.C]	Which Months: All Year Statistical Basis: None specified  Total suspended particulate <= 0.6 lb/MMBTU of heat input.  Which Months: All Year Statistical Paris New 157 l
270	[LAC 33:III.1513.C]	Which Months: All Year Statistical Basis: None specified  Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
271	[LAC 33:III.507.H.1.a]	Nitrogen oxides: When NOx emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, obtain emissions data by using a DEQ-approved monitoring plan per 40 CFR 60.49b(c) to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

#### EQT 0186 1-06 - Rental Boiler

272	[40 CFR 60.44b(k)]	Limit boiler operation to an annual capacity factor of 10 percent or less for natural gas. [40 CFR 60.44b(k)]
273		Submit the maximum heat input capacity data from the demonstration of the maximum heat input capacity of the affected facility to DEQ.
		Subpart Db. [40 CFR 60.49b(b)]
274	[40 CFR 60.49b(d)(2)]	Record and maintain records of the amount of each fuel combusted during each calendar month. [40 CFR 60.49b(d)(2)]

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#### EQT 0186 1-06 - Rental Boiler

275	[40 CFR 60.49b(p)]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the calendar
		date, the number of hours of operation, and the hourly steam load for each steam generating unit operating day. Subpart Db. [40 CFR 60.49b(p)]
276	[40 CFR 60.49b(q)]	Submit a report to DEQ containing the annual capacity factor over the previous 12 months, the average fuel nitrogen content during the reporting
		period if residual oil was fired, and all other applicable information per 40 CFR 60.49b(q)(1) through (q)(3). Subpart Db. [40 CFR 60.49b(q)]
277	[40 CFR 60.49b]	Report information specified in 40 CFR 60.49b(d); (o); (p); (q) and (w). Semi-annual reporting.
278	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60
		consecutive minutes.
	•	Which Months: All Year Statistical Basis: None specified
279	[LAC 33:III.1313.C]	Total suspended particulate <= 0.6 lb/MMBTU of heat input.
		Which Months: All Year Statistical Basis: None specified
280	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to
*		show annual potential sulfur dioxide emissions.

#### EQT 0291 M10 - Diesel Fire-Water Pump

	<del></del>	
281	[40 CFR 63.6603(a)]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of
		the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
282	[40 CFR 63.6603(a)]	Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
283	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first.
		Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
		Which Months: All Year Statistical Basis: None specified
284	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first.
	•	Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
	•	Which Months: All Year Statistical Basis: None specified
285	[40 CFR 63.6605(a)]	Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR
	•	63.6605(a)]
286	[40 CFR 63.6605(b)]	Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart
		ZZZZ. [40 CFR 63.6605(b)]
287	[40 CFR 63.6625(e)]	Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written
		instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner
	•	consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
288	[40 CFR 63.6625(f)]	Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63,6625(f)]
289	[40 CFR 63.6640(a)]	Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a
		and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR
	•	63.6640(a)]
		30100 (3(4))

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#### EQT 0291 M10 - Diesel Fire-Water Pump

	Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]  Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the
•	emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
[40 CFR 63.6655]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
[40 CFR 63.Subpart ZZZZ]	The 40 CFR 63 Subpart ZZZZ requirements listed for this engine become effective on May 3, 2013.
(LAC 33:III.1101.B)	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
[LAC 33:11I.1311.C]	Which Months: All Year Statistical Basis: None specified  Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  Which Months: All Year Statistical Basis: Six-minute average
	[40 CFR 63.6640(f)(1)iii] [40 CFR 63.6640(f)(1)iii] [40 CFR 63.6655] [40 CFR 63.Subpart ZZZZ] [LAC 33:III.1101.B]

#### GRP 0002 SAU - SULFURIC ACID UNITS 1 & 2

Group Members: RLP 0013 RLP 0014

[LAC 33:III.509.R.6.c]

206 FLAC 22-HL 600 D 6 3	
296 [LAC 33:III.509.R.6.a]	Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a
	description of the project: 2) the emissions units whose emissions of a regulated pollutant applied to effect at his the arrival and 2).

description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable.

After the first unit is debottlenecked, the permittee shall monitor the Sulfuric Acid Mist emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Sulfuric Acid Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering.

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#### GRP 0002 SAU - SULFURIC ACID UNITS 1 & 2

298 [LAC 33:III.509.R.6.e]

Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

#### GRP 0021 Comb - Combustion (Unit 1, Unit 2, Package Boiler, Rental Boiler)

Group Members: EQT 0153EQT 0186RLP 0013 RLP 0014

299	[LAC 33:III.509.R.6.a]	Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual
		emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion)
300	[LAC 33:HI.509.R.6.c]	and an explanation for why such amount was excluded, and any netting calculations, if applicable.  After the first unit is debottlenecked, the permittee shall monitor the NOx emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average
		basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and the emission factor(s) established in the air permit application, except for debottlenecked units which shall use data collected from NOx
		CEMs
301	[LAC 33:III.509.R.6.e]	After the first unit is debottlenecked, the permittee shall monitor the PM10 emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average
		basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering.
302	[LAC 33:III.509.R.6.e]	Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions
		differ from the preconstruction projection).

#### UNF 0002 UNF02 - Facility Wide

303 [40 CFR 60.]

All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.

304 [40 CFR 61.145(b)(1)]

Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies.

Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. [40 CFR 61.145(b)(1)]

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#### UNF 0002 UNF02 - Facility Wide

305	[40 CFR 61.148]	Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
306	[40 CFR 61.355]	Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
307	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Rhodia maintains records for five years as required by Title V. Subpart FF.
308	[40 CFR 61.357(d)(2)]	Submit report: Due annually, beginning on the date that equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3) or, if the information in 40 CFR 61.357(a)(1) through (3) is not changed in the following year, a statement to that effect. Subpart FF. [40 CFR 61.357(d)(2)]
309	[40 CFR 61.]	All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
310	[40 CFR 63.1(b)(3)]	An owner or operator of a stationary source who is in the relevant source category and who determines that the source is not subject to a relevant standard or other requirement established under 40 CFR 63 Subpart A must keep a record as specified in 63.10(b)(3). [40 CFR 63.1(b)(3)]
311	[40 CFR 63.1095(a)(1)iii]	Keep a record of each shipment of continuous butadiene waste streams. Subpart XX. [40 CFR 63.1095(a)(1)iii]
312	[40 CFR 63.1095(a)(1)]	Route the continuous butadiene stream to a treatment process or wastewater treatment system used to treat benzene waste streams that complies with the standards specified in 40 CFR 61.348. Subpart XX. [40 CFR 63.1095(a)(1)]
313	[40 CFR 63.1095(a)(1)]	Comply with the requirements of 40 CFR 61 Subpart FF, with the changes in 40 CFR 63 Subpart XX Table 2 and 40 CFR 63.1095(a)(1)(i) through (a)(1)(v). Subpart XX. [40 CFR 63.1095(a)(1)]
314	[40 CFR 63.1095(a)(1)]	Include list of continuous butadiene waste streams in annual benzene NESHAP report and note whether or not streams were controlled. 40 CFR 63.1095(a)(1)(iv) & (v). Subpart XX. [40 CFR 63.1095(a)(1)]
315	[40 CFR 63,1095(a)(3)]	Comply with the requirements of 40 CFR 63.1095 at all times except during periods of startup, shutdown, and malfunction, if the startup, shutdown, or malfunction precludes the ability of the affected source to comply with the requirements of 40 CFR 63.1095 and the provisions for periods of startup, shutdown, and malfunction, as specified in 40 CFR 63.1111, are followed. Subpart XX. [40 CFR 63.1095(a)(3)]
316	[40 CFR 63.1096(b)]	Submit to EPA a written certification that affected waste streams will be managed and treated per the applicable sections in 40 CFR 63 Subpart XX. Not required unless/until wirtten notice is received from generator of subject stream(s). Waste streams regulated under Subpart XX are to be treated and managed per 40 CFR Part 61 Subpart FF, National Emission Standards for Benzene Waste Operations. Rhodia's Baton Rouge site is already in compliance with Subpart FF and will manage XX-regulated waste streams in the same manner as for FF-regulated waste
317	[40 CFR 63.1256(a)(5)(ii)(A)]	streams. Specifically, the XX-regulated waste streams will be burned as fuel in Unit No. 1 or Unit No. 2. Subpart XX. [40 CFR 63.1096(b)] Submit to EPA a written certification that affected wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.1256 (b) - (i). Not required unless/until wirtten notice is received from generator of subject stream(s). Affected wastewater streams and/or residuals will be direct burned (i.e., bypassing storage) in the Unit No. 1 or Unit No. 2 furnace. [40 CFR 63.1256(a)(5)(ii)(A)]
318	[40 CFR 63.1256(b)]	Comply with 40 CFR 63.1256(b) for each wastewater tank that receives, manages, or treats affected wastewater or its residual. Only Tanks 30D290 and 30D300 will be used for Subpart GGG regulated streams. [40 CFR 63.1256(b)]

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#### UNF 0002 UNF02 - Facility Wide

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319	[40 CFR 63.1256(d)(1)(iii)]	For containers (trucks/railcars), the cover and all openings will be maintained in a closed position at all times that affected material is in the container except when necessary to use the opening for removal, inspection, sampling, or pressure relief events related to safety considerations.
320	[40 CFR 63.1256(g)(13)ii]	[40 CFR 63.1256(d)(1)(iii)]
340	[40 CFR 03.1250(g)(15)ff]	Discharge affected streams to a boiler burning hazardous waste for which a final permit has been issued under 40 CFR Part 270 and that complies with the requirements of 40 CFR Part 266 Subpart H. The regeneration furnaces are regulated under RCRA as industrial furnaces and
		are defined as boilers in 40 CFR 1251. Per 1256(g)(13), RCRA units are exempt from the design evaluation or performance test requirements
		and from the monitoring requirements in 1256(a)(2)(iii) as well as recordkeeping and reporting requirements associated with monitoring and performance tests. [40 CFR 63.1256(g)(13)ii]
321	[40 CFR 63.132(g)(2)]	Submit to EPA a written certification, signed by responsible official, that Group 1 wastewaters and/or wastewater residuals will be managed and
		treated per the applicable sections in 40 CFR 63.133 - 63.147. Not required unless/until written notice is received from generator of subject stream(s). [40 CFR 63.132(g)(2)]
322	[40 CFR 63.132(g)]	Rhodia will comply with the provisions for off-site treatment of Group 1 HON wastewater or wastewater residuals in accordance with 40 CFR
		63.132(g) if/when applicable. Subpart G. [40 CFR 63.132(g)]
323	[40 CFR 63.147]	Maintain records as required by 40 CFR 63.147. This requirement only applies if/when notice is received from a customer that a HON Group 1
		wastewtater or residual has been shipped to Rhodia. Subpart G.
324	[40 CFR 63.152(b)]	Submit a Notification of Compliance Status (NCS) report within 150 days of the compliance date. As the treatment facility, the compliance date
		is the date upon which notice is first received that a HON Group 1 wastewater or wastewater residual has been recieved onsite. [40 CFR
		63.152(b)]
325	[40 CFR 63.152(c)]	Submit Periodic Reports: Due semiannually no later than 60 calendar days after the end of each 6-month period, except as specified in 40 CFR 63.152(c)(5) and (c)(6). Submit the first report no later than 8 months after the date the Notification of Compliance Status is due. Include the
		information specified in 40 CFR 63.152(c)(2) through (c)(4). Subpart G. [40 CFR 63.152(c)]
326	[40 CFR 63.152(f)]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records as specified in 40 CFR 63.152(f)(1) through (f)(7). Subpart G. [40 CFR 63.152(f)]
327	[40 CFR 68.150]	Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first
		listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and
220	[40 CPD C0 155]	format to a central point as specified by EPA prior to June 21, 1999.
328	[40 CFR 68.155]	Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (g).
329	[40 CFR 68.160]	Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (13).
330	[40 CFR 68.165]	Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (13).
331	[40 CFR 68.180]	Provide in the RMP the emergency response information listed in 68.180(a) through (c).
332	[40 CFR 68.190(c)]	Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the
		stationary source is no longer covered. [40 CFR 68.190(c)]
333	[40 CFR 68.190]	Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.

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#### UNF 0002 UNF02 - Facility Wide

334	[40 CFR 68.200]	Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
	[40 CFR 68.22]	Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
	[40 CFR 68.25]	Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
	[40 CFR 68.30]	Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
338	[40 CFR 68.33]	List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
339	[40 CFR 68.36(b)]	Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
340	[40 CFR 68.36]	Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
341	[40 CFR 68.39]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.
342	[40 CFR 68.42]	Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (10) for each accidental release.
343	[LAC 33:III.1103]	Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
344	[LAC 33:III.1109.B]	Outdoor burning of waste material or other combustible material is prohibited.
345	[LAC 33:HI.1303.B]	Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
346	[LAC 33:III.2113.A]	Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
347	[LAC 33:III.219]	Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
348	[LAC 33:III.2901.D]	Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
349	[LAC 33:III.2901.F]	If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
350	[LAC 33:III.5105.A.1]	Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.

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#### UNF 0002 UNF02 - Facility Wide

351	[LAC 33:III.5105.A.2]	Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.
352	[LAC 33:III.5105.A.3]	Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would
		otherwise constitute a violation of an applicable standard.
353	[LAC 33:III.5105.A.4]	Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
354	[LAC 33:III.5107.A.2]	Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in
		the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full
	FT 1 = 22 YEV	name of the responsible official, title, signature, date of signature and phone number of the responsible official
355	[LAC 33:III.5107:A]	Submit Annual Emissions Report: Due annually, by the 30th of April unless otherwise directed by DEO, to the Office of Environmental Services
		in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or
256	[LAC 33:III.5107.B.1]	Table 51.3.
330	[LAC 33,III.3107.B.1]	Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595
	·	immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in
		an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
357	[LAC 33:III.5107.B.2]	Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized
		discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was
		not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER)
		in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one
		pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33.1 3923
358	[LAC 33:III.5107.B.3]	Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6. immediately, but in no case later than 24 hours after any
		unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in
	*	excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33 I 3931
359	[LAC 33:III.5107.B.4]	Submit notification in the manner provided in LAC 33:1.3923.
339	[EAC 33.111.5107.B.4]	Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as
360	[LAC 33:III.5107.B.5]	referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
	( <u></u>	Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or
		a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the
		identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
361	[LAC 33:III.5109.C]	Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC
		33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards
		is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC
		33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEO. Provide a copy
		of the SOP within 30 days upon request by DEQ.

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#### UNF 0002 UNF02 - Facility Wide

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362	[LAC 33:III.5113.A.1]	Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of
		the initial start-up.
363	[LAC 33:III.5113.A.2]	Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
364	[LAC 33:III.5113.B.1]	Ensure that all testing done to determine the emission of toxic air pollutants is conducted by qualified personnel.
365	[LAC 33:III.5113.B.1]	Submit test results: Due in writing to the Office of Environmental Services within 60 days after completion of the test. Submit test results signed by the person responsible for the test.
366	[LAC 33:III.5113.B.1]	Submit notification of testing: Due to the Office of Environmental Services at least 30 days prior to testing.
367	[LAC 33:III.5113.B.2]	Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
368	[LAC 33:III.5.113.B.3]	Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants.
369	[LAC 33:III.5113.B.4]	Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through B.4.e.
370	[LAC 33:III.5113.B.5]	Submit certified letter: Due to the Office of Environmental Services before the close of business on the sixtieth day following the completion of the emission test. Report the determinations of the emission test.
371	[LAC 33:III.5113.B.5]	Analyze samples and determine emissions within 30 days after each emission test has been completed.
372	[LAC 33:III.5113.B.6]	Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location
- · -		approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.
373	[LAC 33:III.5113.B.7]	Submit notification: Due to the Office of Environmental Services at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
374	[LAC 33:111.5113.C.1]	Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
375	[LAC 33:III.5113.C.5.d]	Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters.
376	[LAC 33:III.5113.C.5.e]	Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii.
377	[LAC 33:III.5113.C.7]	Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the
		monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a
		minimum of three years and make available, upon request, for inspection by DEQ.
378	[LAC 33:III.5151.F.1.f]	An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing
		Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or
		renovation activity.
379	[LAC 33:III.535]	Permittee shall comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]. [LAC 33:III.537].

Al ID: 1314 - Rhodia Inc Activity Number: PER20120011 Permit Number: 0840-00033-V5 Air - Title V Regular Permit Minor Mod

#### UNF 0002 UNF02 - Facility Wide

[LAC 33:III.5611.A]	Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution
[LAC 33:III.5611.B]	Emergency: Due within 30 days after requested by the administrative authority.  During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
[LAC 33:III.5901.A]	Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
[LAC 33:III.5907]	Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
[LAC 33:III.5911.C]	Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.
[LAC 33:111.919.F]	Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Services
[LAC 33:III.927]	Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-G.  Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.
	[LAC 33:III.5611.B]  [LAC 33:III.5901.A]  [LAC 33:III.5907]

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BOBBY JINDAL GOVERNOR



PEGGY M. HATCH SECRETARY

#### State of Louisiana

### DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

Certified Mail No. 7005 0390 0006 1029 1380

Activity No.: PER20110006 Agency Interest No. 1314

Mr. Daniel Tate Plant Manager Rhodia, Inc. P.O. Box 828 Baton Rouge, La 70821

RE:

Part 70 Operating Permit Modification

Rhodia, Inc. - Sulfuric Acid Plant - Baton Rouge Facility Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Tate:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 11th of May, 2016, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Permit No.: 0840-00033-V4

Sincerely,

Sam L. Phillips Assistant Secretary

SLP: EMC

c: EPA Region VI

AIR PLANNING SEC

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Sulfuric Acid Plant - Baton Rouge Facility
Agency Interest No.: 1314
Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

#### I. Background

Rhodia Inc. (Rhodia) operates a Sulfuric Acid Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces sulfuric acid by using two sulfuric acid production trains (Unit No. 1 and Unit No. 2). Unit No. 1 was constructed in 1953 and unit No. 2 was constructed in 1968. Previously the facility operated under Title V Permit 0840-00032-V0 dated October 12, 2005, Title V General Permit No. 3032-V1 issued December 13, 2006, and Title V Permit 0840-00032-V2 issued November 30, 2009. Currently the facility operates under a consolidated Title V Permit 0840-00032-V3 dated May 11, 2011.

Rhodia has entered into a Consent Decree (Civil Action No. 2:07CV134 WL) with the United States and various State parties including Louisiana, effective July 23, 2007. This Consent Decree requires Rhodia to install controls for SO<sub>2</sub> emissions at their various plant sites nation wide. The requirements for the Baton Rouge Facility have been incorporated into this permit.

#### II. Origin

An air permit application and Emission Inventory Questionnaire (EIQs) were submitted by Rhodia, Inc. on December 15, 2011 requesting a Part 70 operating permit modification.

#### III. Description

#### Sulfuric Acid Plant

Rhodia receives spent sulfuric acid and hazardous waste fuels from off-site sources and recovers the sulfur and energy values in its industrial furnaces, forming fresh sulfuric acid. The sulfuric acid production process begins with treatment of the feed streams in the industrial furnace. Liquids are sprayed using atomizers into the combustion chamber. Normal operating conditions are 2% to 4% excess furnace oxygen and furnace temperature between 1800°F and 2200°F at the furnace discharge. Furnace residence time is approximately three seconds. The feed streams are producing steam for process use. Gas from the waste heat boiler is further cooled and cleaned in the gas scrubbing system. This system includes spray scrubbing and wet electrostatic precipitators to remove acid mist and particulate emissions.

Cooling systems reduce the gas temperature from 600°F to 100°F. The wet gas is then dried through counter-current packed flow columns circulating ≥93% sulfuric acid. Dry gas is heated to 800°F before the sulfur dioxide is converted to sulfur trioxide using catalyst.

## Sulfuric Acid Plant - Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

Because the conversion step to sulfur trioxide is exothermic, the hot exhaust gas is used to heat up the incoming feed by cross-current heat exchange.

Sulfur trioxide from the converter enters a countercurrent packed absorption tower. Strong sulfuric acid absorbs and hydrolyzes the sulfur trioxide to sulfuric acid. The demisters are the final pollution control device, removing primarily sulfuric acid mist generated in the acid tower. The demisters also control HCl and particulate emissions.

The preceding process description pertains to Unit No. 1. The Unit No. 2 process is slightly different. After the drying step, the gas enters a second sulfur burning furnace, followed by a hot gas filter. This added step heats the gas, affording a second occasion for combustion. Unit No. 2 has over twice the capacity of Unit No. 1. Equipment is sized proportionately, with Unit No. 2 having a longer residence time.

#### Waste Storage

Seven tanks have been constructed specifically for the storage of hazardous waste. These seven tanks are located in the truck and rail unloading facility and operate under a nitrogen pad. A positive pressure vent system is tied into Unit No. 2 or to the TS Vapor Combustor to burn all fumes and vapors.

#### Package Boiler

The package boiler provides backup and supplemental steam production to Units No. 1 and No. 2. It is rated for 80,000 lbs/hr steam production with a heat input of 106 MM BTU/hr and is permitted for an annual average heat input of 50 MM BTU/hr. It is fired with natural gas only and is equipped with low-NOx burners and a continuous flue gas oxygen analyzer.

#### Rental Boiler

The rental boiler provides backup steam production to Units No. 1 and No. 2 and the package boiler. It is fired with natural gas only and has a maximum firing rate of 133 MM BTU/hr but is limited to a calendar average firing rate of 12.4 MM BTU/hr per 40 CFR 60.44b(j)(2).

#### SO<sub>2</sub> Abatement Scrubbers and Debottlenecking Project

As part of Rhodia's consent decree for the Baton Rouge facility, Rhodia will install packed bed scrubbers on Sulfuric Acid Unit No. 1 and Unit No. 2 to control SO<sub>2</sub> emissions, which will be reduced by more than 10,000 TPY by the completion of Phase III of the project. Also

## Sulfuric Acid Plant - Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

as part of the consent decree, the Environmental Protection Agency (EPA) agreed to allow the Sulfuric Acid Plant to undergo an expansion project. This project will allow the facility to increase its total Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) production from 2,200 tons/day to 2,800 tons/day. Specifically, the capacity of Sulfuric Acid Unit No.1 (EPN 3) will increase from 700 tons/day to 900 tons/day of sulfuric acid, and the capacity of Sulfuric Acid Unit No. 2 (EPN 2) will increase from 1,500 tons/day to 1,900 tons/day. The capacity increase will be accomplished with a series of debottlenecking projects.

Rhodia is requesting the following changes with this permit modification.

- 1. Reconcile emissions of HCl and Cl<sub>2</sub> from the Unit 1 (RLP 0014) and Unit 2 (RLP 0013) Sulfuric Acid Regeneration Unit (SARU) stacks based on recent stack test data and conservative assumptions.
- 2. Reconcile VOC emissions from the Unit 1 and Unit 2 SARUs to use a lbs/ton emission factor calculated from stack test data instead of using the straight lbs/hr stack test results. The annual emissions for Units 1 and 2 are part of emission caps, RLP 0014, RLP 0013, CAP-Comb, and CAP-SAU emissions will be affected.
- 3. Include (ABCO) Boiler (EQT 0153) emissions in emission cap "CAP-Comb" to better reflect function as supplemental/backup stream to the Unit 1 and Unit 2 SARUs.
- 4. Reconcile emissions for the Treatment Services Vapor Combustor (TSVC, EQT 0147) and Acid Plant Vapor Combustor (APVC, EQT 0151).
- 5. Update General Conditions XVII Activities and Insignificant Activities.
- 6. Update RLP 0013 and RLP 0014 stack parameters using more recent design data.
- 7. Update the Specific Requirement No. 12 because the permits (7777-00314-01 and 7777-00413-00 which were referred by the requirement) have been rescinded, thus if a substitute scrubber is used, it will simply comply with the same requirements as the primary unit.
- 8. Delete LAC 33:III.1101.B requirements from equipment which use natural gas as fuel.

#### Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
$\overline{\mathrm{PM}_{10}}$	58.16*	58.43 <sup>*</sup>	+0.27
SO <sub>2</sub> (Phase II)	4726.08	4726.23	+0.15
SO <sub>2</sub> (Phase III)	1077.89	1078.06	+0.17
NO <sub>x</sub>	117.13	118.64	+1.51

## Sulfuric Acid Plant - Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

Pollutant	Before	After	Change
CO	95.76	103.81	+8.05
VOC	26.55	29.60	+3.05
$HAPs^{1}$	8.92	9.18	+0.26

Includes sulfuric acid mist

Phase II is effective from January 1, 2011 through April 30, 2012.

Phase III becomes effective on May 1, 2012.

For a list of HAP and its respective emission rates in tons per year see the TPOR0146 report – Emission Rates For TAP/HAP & Other Pollutants.

For HAPs speciation see Table A.

#### LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
2,6-Dinitrotoluene	0.04	0.04	
Ammonia	0.56	0.56	·
Barium (and compounds)	0.18	0.18	-
Chlorine dioxide	0.01	0.01	-
Copper (and compounds)	0.11	0.11	-
Diaminotoluene (mixed isomers)	0.12	0.12	<b>-</b> .·
Hydrogen sulfide	0.49	0.49	-
Nitric acid	0.14	0.14	. <del>-</del>
Pyridine	0.56	0.56	-
Sulfuric acid	42.36	42.38	+0.02
Toluene-2,6-Diisocyanate	0.01	0.01	_
Zinc (and compounds)	0.22	0.22	-
n-butyl alcohol	1.00	1.00	-
Total TAPs	45.80	45.82	+0.02

Table A					
Pollutant Type					
VOC	1,1,2,2-Tetrachloroethane	Captan	Methyl bromide		
l .	1,1,2-Trichloroethane	Carbaryl	Methyl chloride		
	1,1-Dichloroethane	Carbon disulfide	Methyl ethyl ketone		

<sup>&</sup>lt;sup>1</sup>Facility wide CAP for total HAPs (VOC + non-VOC).

# Sulfuric Acid Plant - Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

. "	1,1-Dimethylhydrazine	Carbon tetrachloride	Methyl isobutyl ketone
	1,2,4-Trichlorobenzene	Carbonyl sulfide	Methyl methacrylate
	1,2-Dibromo-3-chloropropane	Chlordane	Methylene diphenyl diisocyanate
	1,2-Dibromoethane	Chloroacetic acid	Monomethyl hydrazine
	1,2-Dichloroethane	Chlorobenzene	N,N-Diethyl aniline
	1,2-Dichloropropane	Chloroethane	N,N-dimethylbenzenamine
	1,2-Diphenylhydrazine	Chloroform	N-Nitroso-N-Methylurea
	1,2-Epoxybutane	Chloromethyl methyl ether	N-Nitrosodimethylamine
	1,2-Epoxyethylbenzene	Chloroprene	N-Nitrosomorpholine
	1,2-Oxathiolane 2,2-dioxide	Chromium VI (and compounds)	Naphthalene
	1,3-Butadiene	Cobalt compounds	Nickel (and compounds)
	1,3-Dichloropropene	Cresol	Nitrobenzene
	1,4-Dichlorobenzene	Cumene	Parathion
	1,4-Dioxane	Cyanide compounds	Pentachloronitrobenzene
	2,2'-dichlorodiethylether	Diazomethane	Phenol
	2,2,4-Trimethylpentane	Dibutyl phthalate	Phosgene
	2,4,5-Trichlorophenol	Dichlorvos	Phosphorus, Total (as P)
	2,4,6-Trichlorophenol	Diethanolamine	Phthalic Anhydride
	2,4-Dichlorophenoxyacetic Acid	Diethyl Sulfate	Polychlorinated biphenyls
	2,4-Dinitrophenol	Dimethyl formamide	PAH
	2,4-Dinitrotoluene	Dimethyl phthalate	Propionaldehyde
	2,4-Toluene diamine	Dimethyl sulfate	Propoxur
	2-Acetylaminofluorene	Dimethylcarbamoyl chloride	Propylene
	2-nitro-Propane	Epichlorohydrin	Propylene oxide
	3,3'-Dichlorobenzidine	Ethyl 4,4'-Dichlorobenzilate	Propylenimine
	4,4'-Methylenebis-(2-Chloroaniline)	Ethyl Acrylate	Pyrocatechol
	4,4'-Methylenebisbenzeneamine	Ethyl benzene	Quinoline
	4,6 Dinitro-o-cresol	Ethylene	Quinone
	4-Aminodiphenyl	Ethylene glycol	Selenium (and compounds)
	4-Dimethylaminoazobenzene	Ethylene oxide	Styrene
	4-Nitrobiphenyl	Ethyleneimine	Toluene
	4-Nitrophenol	Ethylenethiourea	Toluene-2,4-diisocyanate
	Acetaldehyde	Formaldehyde	Toxaphene
	Acetamide	Glycol ethers (Table 51.1)	Trichloroethylene
	Acetonitrile	Glycol ethers (Table 51.3)	Triethyl amine
	Acetophenone	Heptachlor	Trifluralin
	Acrolein	Hexachlorobenzene	Urethane
	Acrylamide	Hexachlorobutadiene	Vinyl acetate
	Acrylic acid	Hexachlorocyclopentadiene	Vinyl bromide
	Acrylonitrile	Hexachloroethane	Vinyl chloride
	Allyl chloride	Hexamethylene diisocyanate	Vinylidene chloride

## Sulfuric Acid Plant - Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

	Amiben	Hexamethylphosphoramide	Xylene (mixed isomers)
	Aniline	Hydrazine	alpha-Chloroacetophenone
	Antimony (and compounds)	Hydrogen cyanide	beta-Propriolactone
	Arsenic (and compounds)	Hydroquinone	bis(2-ethylhexyl)phthalate
	Benzene	Iodomethane	bis(Chloromethyl)ether
	Benzidine	Isophorone	n-Hexane
	Benzotrichloride	Lindane	o-Aminoanisole
٠	Benzyl chloride	Maleic anhydride	o-dianisidine
	Beryllium (Table 51.1)	Manganese (and compounds)	ortho-Tolidine
	Biphenyl	Mercury (and compounds)	ortho-Toluidine
	Bromoform	Methanol	p,p'-DDE
	Butene (mixed isomers)	Methoxychlor	para-Phenylenediamine
	Cadmium (and compounds)	Methyl Isocyanate	pentachloro-Phenol
	Calcium cyanamide	Methyl Tertiary Butyl Ether	
Non-VOC	1,1,1-Trichloroethane	. Hydrochloric acid	Tetrachloroethylene
	Chlorine	Hydrofluoric acid	Titanium tetrachloride
	Dichloromethane	Phosphine	•

#### IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a major source of criteria pollutants. The facility is also a major source of Toxic Air Pollutants (TAPs) under LAC 33:III. Chapter 51. The facility is not a major source of Hazardous Air pollutants (HAPs); however, wastewater and wastewater residuals from facilities subject to 40 CFR 63 Subpart G and other MACT standards or NSPS may be treated at the facility. Therefore, the Sulfuric Acid Plant complies with any applicable provisions of these MACT/NSPS standards.

#### **Permit Shield**

Per 40 CFR 70.6(f) and LAC 33:III.507.I, a permit shield has been determined for the referenced facility as follows:

1. Per 40 CFR 60.8(c), emissions in excess of a standard are not in violation during startup, shutdown, or malfunction events. Further, per 40 CFR 60.11(c), the opacity

Sulfuric Acid Plant - Baton Rouge Facility
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Rhodia, Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana

standards do not apply during periods of startup, shutdown, and malfunction. Rhodia's Consent Decree defines startup as, "the 24-hour period at any sulfuric acid plant beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oils, to the furnace commences after a main gas blower shutdown" but there is no such definition in 40 CFR 60 Subpart H. Therefore, Rhodia has requested a permit shield to use the Consent Decree definition of "startup" for determining compliance with the 40 CFR 60 Subpart H 10% opacity limit and the 0.15 lbs/ton limit.

2. The Unit No. 1 and Unit No. 2 furnaces are treatment processes for certain waste streams regulated under 40 CFR 61 Subpart FF (Benzene Waste NESHAP). Per 40 CFR 61.348(e) certain requirements apply if the treatment process has any openings (e.g., access doors, hatches, etc.)

The furnaces operate at less than atmospheric pressure which is continuously monitored. Annual inspections per 61.348(e)(3)(ii) are conducted. Frequent inspections and repairs are conducted to minimize any cracks and unsealed openings. Very small openings may go undetected and/or not be repaired because the furnaces operate under vacuum. Occasionally, the furnaces may experience a short-term positive pressure when introducing a new feed to the furnace. This issue was reviewed with LDEQ for the recently issued BIF permit. The BIF permit requires that furnace pressure be maintained at -0.1 inches of water maximum, 10-second delay. The 10-second delay is allowed to normalize the pressure before automatically shutting down feeds to the furnace.

Rhodia requested a permit shield that allows compliance with 61.348(e) to be demonstrated by maintaining furnace pressure at -0.1 inches of water maximum, 10-second delay and operating furnace openings with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h).

3. For the Treatment Services Fugitive Emissions (EIQ FUG-TS), per the Louisiana Fugitive Emissions Program Consolidation Guidelines, Rhodia follows a streamlined fugitive monitoring program with the Louisiana MACT Determination for Non-HON sources as the most stringent program. Rhodia has reduced site-wide permitted emissions of all class I and II TAPs emitted from source FUG-TS to below their MERs. Thus, LA Non-HON MACT no longer applies. However, Rhodia is voluntarily choosing to continue to comply with the LA Non-HON MACT since the

Sulfuric Acid Plant - Baton Rouge Facility
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program is already in place. Therefore, Rhodia is requesting a permit shield to ensure that complying with LA Non-HON MACT still ensures compliance with the underlying programs that were consolidated (40 CFR 264 Subpart BB and 40 CFR 61 Subpart V).

4. Rhodia requested a permit shield stating that compliance with the NSPS Subpart H acid mist and opacity standards constitutes compliance with the LAC 33:III.Chapter 15 acid mist standard and the LAC 33:III.1311.C opacity standard and that compliance with the SO<sub>2</sub> standard in the permit (long-term and short-term limits which are lower than the Subpart H standard of 4.0 lbs/ton) constitutes compliance with the LAC 33:III.Chapter 15 SO<sub>2</sub> standard. "Standard" in this context includes all monitoring, recordkeeping, reporting, and testing. This permit shield is effective upon permit issuance for Unit 2 for all three pollutants and for Unit 1 for acid mist. It becomes effective for Unit 1 SO<sub>2</sub> and opacity when the more stringent standards become effective on May 1, 2012

#### V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

#### VI. Public Notice

Public notice is not required for a minor modification to a Part 70 Operating Permit.

#### VII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the LDEQ Air Permits Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions for this permit modification. However, LDEQ did require

# Sulfuric Acid Plant - Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

modeling for the 0840-00033-V2 permit, which the facility submitted on October 6, 2008. The results are presented below.

Dispersion Model(s) Used: <u>ISCT3</u>

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Chlorine	8-Hour	26.71 μg/m <sup>3</sup>	35.7 μg/m <sup>3</sup>
Hydrochloric acid	8-Hour	134.82 μg/m <sup>3</sup>	180.0 μg/m <sup>3</sup>
Sulfuric acid	8-Hour	$22.32  \mu g/m^{3*}$	23.8 μg/m <sup>3</sup>
MIBK	8-Hour	323.02 μg/m <sup>3</sup>	4880 μg/m <sup>3</sup>
Dichloromethane	Annual	0.8667 μg/m <sup>3</sup>	212.77 μg/m <sup>3</sup>
Acrylonitrile	Annual	$1.152  \mu g/m_3^3$	1.47 $\mu g/m_{_{2}}^{3}$
1,3-Butadiene	Annual	$0.723  \mu g/m^3$	0.92 μg/m <sup>3</sup>
Antimony	8-Hour	0.466 μg/m³	11.90 μg/m <sup>3</sup>
Arsenic	Annual	0.00004 μg/m³	$0.02  \mu \text{g/m}^3$
Barium	8-Hour	0.884 μg/m³ <sub>_</sub>	11.90 μg/m <sup>3</sup>
Chromium VI	Annual	0.00004 μg/m <sup>3</sup>	$0.01 \ \mu g/m^3$
Copper	8-Hour	$0.40913  \mu g/m^3$	23.80 μg/m <sup>3</sup>
Manganese	8-Hour	0.27827 μg/m <sup>3</sup>	$4.76  \mu g/m_3^3$
Nickel	Annual	0.00004 μg/m <sup>3</sup>	$0.21  \mu g/m_3^3$
Selenium	8-Hour	0.35001 μg/m <sup>3</sup>	4.76 μg/m <sup>3</sup>
Zinc	8-Hour	0.80561 μg/m³	119.00 μg/m³
SO <sub>2</sub> *	Annual	21.88 μg/m³	(80 μg/m³)
	24-Hour	335.04 μg/m <sup>3</sup>	(365 μg/m³)
*Phase I emissions	3-Hour	1017.57 μg/m <sup>3</sup>	(1300 μg/m³)
(worst case)		. •	

### Sulfuric Acid Plant - Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

### VIII. General Condition XVII Activities

GC1 Catalyst reconditions Acid Unit Nos. 1 & 2 GC2 Drum re-packaging Vacuum trucks used cleanouts, spill clean clean out  GC4 Tank and process equ cleaning Opening of truck and containing waste fuel for sampling, inspect maintenance, or furth GC6 Sampling waste fuel and tanks via sample GC7 Sampling spent acid railcars, and barges Washing inside surfa 1 & 2 exhaust stacks GC9 Odor-neutralizing co GC10 Manual gauging of ta Melting sulfur solidif GC11 and other equipment	for tank up, and sump uipment I railcars I and spent acid	Schedule Once each 24 months per unit 4 times per year Weekly Daily	PM <sub>10</sub> 0.2	0.06 0.1	on Rates	СО	0.002 0.06 0.90	Other
GC1 Catalyst reconditioned Acid Unit Nos. 1 & 2 GC2 Drum re-packaging Vacuum trucks used clean out GC3 cleanouts, spill clean clean out Tank and process equivalent containing of truck and containing waste fuel for sampling, inspect maintenance, or furth Sampling waste fuel and tanks via sample GC6 Sampling spent acid railcars, and barges GC8 Washing inside surfarance in the sampling surfarance in the sampling spent acid railcars, and barges GC8 Odor-neutralizing confidence in the sampling surfarance in the sampling spent acid railcars, and barges GC9 Odor-neutralizing confidence in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in the sampling surfarance in	for tank up, and sump uipment I railcars I and spent acid	months per unit 4 times per year Weekly		0.06		-	0.002	
GC3 cleanouts, spill clean clean out  GC4 Tank and process equestion cleaning  Opening of truck and containing waste fuel for sampling, inspect maintenance, or furth  GC6 Sampling waste fuel and tanks via sample  GC7 Sampling spent acid railcars, and barges  Washing inside surfa 1 & 2 exhaust stacks  GC9 Odor-neutralizing conditions of the containing waste fuel and tanks via sample  GC8 Washing inside surfa 1 & 2 exhaust stacks  GC9 Odor-neutralizing conditions of the containing sulfur soliding sulfur soliding	up, and sump uipment I railcars I and spent acid tion,	4 times per year Weekly			-		0.06	
GC3 cleanouts, spill clean clean out  GC4 Tank and process equencies of cleaning  Opening of truck and containing waste fuel for sampling, inspect maintenance, or furth  GC6 Sampling waste fuel and tanks via sample  GC7 Sampling spent acid railcars, and barges  Washing inside surfarance of the sampling spent acid railcars, and barges  GC8 Washing inside surfarance of the sampling corrected of the sampling corrected of the sampling spent acid railcars, and barges  GC8 Odor-neutralizing corrected of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling sulfur solidifies of the sampling	up, and sump uipment I railcars I and spent acid tion,				-			
GC4 cleaning Opening of truck and containing waste fuel for sampling, inspect maintenance, or furth and tanks via sample GC6 Sampling waste fuel and tanks via sample GC7 Sampling spent acid railcars, and barges Washing inside surfa 1 & 2 exhaust stacks GC9 Odor-neutralizing contained of the Melting sulfur solidification of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the contained of the	l railcars l and spent acid tion,	Daily		0.1			0.90	
GC5 containing waste fuel for sampling, inspect maintenance, or furth Sampling waste fuel and tanks via sample GC7 Sampling spent acid railcars, and barges Washing inside surfa 1 & 2 exhaust stacks GC9 Odor-neutralizing conditions of the Melting sulfur solidification of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample of the sample	l and spent acid	Daily						
GC6 and tanks via sample  GC7 Sampling spent acid railcars, and barges  GC8 Washing inside surfa 1 & 2 exhaust stacks  GC9 Odor-neutralizing cor  GC10 Manual gauging of ta Melting sulfur solidif		-		0.5			0.01	
GC7 railcars, and barges Washing inside surfa 1 & 2 exhaust stacks GC9 Odor-neutralizing co GC10 Manual gauging of ta Melting sulfur solidif		10 times per day					0.03	##.
GC8 1 & 2 exhaust stacks GC9 Odor-neutralizing cor GC10 Manual gauging of ta Melting sulfur solidif	and IFS trucks,	8 times per day		0.004			0.004	
GC10 Manual gauging of ta Melting sulfur solidif		2 times per year		•	0.25			0.01*
Melting sulfur solidif	mpounds						0.06	
	ınk levels			0.5			0.1	
sulfur pit (formerly E	at the old IQ 18)			<0.001				<0.001#
GC12 Stack gauging, and pr readings from gas str	essure eams			0.1				0.1*
GC13 Loading fresh acid or spent acid				0.003			0.004	
GC14 Acid Plant Vapor Co. (APVC) routine main		240 hours per year (max)			•		4.62	**
GC15 Unloading containers with chlorinated VOC for VOCs, caustic ser SO2 present)	Cs (carbon bed	1 per week		0.1			0.06	**

\*Sulfuric Acid Mist

<sup>#</sup>Hydrogen Sulfide

\*\* VOC Speciation similar to Spent Acid Process permitted emissions

## VOC Speciation similar to TS Process permitted emissions

# Sulfuric Acid Plant - Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

#### IX. Insignificant Activities

ID No.	Description	Operating Rate (Max) or Tank Capacity	Regulation
20D962	Diesel Storage Tank, Firewater Pump	300 gal	LAC 33:III.501.B.5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gal	LAC 33:III.501.B.5.A.3
,02500	Diesel Storage Tank, IFS	1000 gal	LAC 33:III.501.B.5.A.3
91D321	IFS Wash-water Storage Tank	9000 gal	LAC 33:III.501.B.5.A.3
90D210	Laboratory Excess Sample Tank	100 gal	LAC 33:III.501.B.5.A.2
Hoods	Different Analyses	N/A	LAC 33:III.501.B.5.A.6
	Drum Washing Operations	55 gal	LAC 33:III.501.B.5.A.7
	Temporary (seasonal) Portable Gasoline Tank	550 gals	LAC 33:III.501.B5.A.8

<sup>\*</sup>Vents associated with exhaust hoods for laboratory equipment used exclusively for routine chemical and physical analysis with the purpose of quality control or environmental monitoring purposes.

ID	Description									LA	AC 33:	III.Ch	apter		•					
No.:	Description	5 <sup>*</sup>	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
UNF002	Facility Wide	1	1	1	1	İ			i .			1		<del>                                     </del>	<del> </del>			ī	1	+ 1
ARE002	M4 - West End Sump													<u> </u>					<u> </u>	<del></del>
ARE003	M3 - Treatment Services Sumps																	···		+
EQT008	30D260 - Spent Acid Tank		T					2				<u> </u>							<del> </del>	+
EQT140	10 - Preheater; Acid Unit No. 1	<u> </u>	T	1	1	2					<u> </u>	· · · · · ·								<del> </del>
EQT141	11 – Lime Silos				1														†	<del>                                     </del>
EQT142	12 - Oleum Loading Vent Scrubber	1																1	<u> </u>	+
EQT146	20 - Sulfur Feed Tank					2		·											·	<del></del>
EQT147	21 - TS Vapor Combustor			1	1	2		1										i	<del> </del>	+
EQT149	24 - Oleum Barge Loading Scrubber	1	1										<del>                                     </del>					1	<del> </del>	<del></del>
EQT150	26 - Spent Acid Barge Loading Scrubber	1								3			2					-		
EQT151	27 - Acid Plant Vapor Combustor			1	1	2		2			· ·							ī	<del> </del>	-
EQT152	28 - Gasoline Storage Tank							1			· · · · · · · · · · · · · · · · · · ·									<del>                                     </del>
EQT153	6-90 - Package Boiler				1	2							i						<u> </u>	
EQT154	M1a - Unit 2 Cooling Tower				2							:								1
EQT155	Mlb - Unit I Cooling Tower				2				,										<del> ,</del>	
EQT285	20D380 - Unit 2 Weak Acid Tank	:																	<u> </u>	
EQT157	30D030 - Oleum Tank		T									Í					•		<u> </u>	1
EQT158	30D040 – 93/Oleum																	•		<b>†</b>
EQT159	30D050 - 99WW Tank																		<u> </u>	<u> </u>
EQT161	30D070 - Spent Acid Tank					,		2				i							1	1
EQT163	30D100 - Spent Acid Tank							2											<del> </del>	1
EQT164	30D110 - Spent Acid Tank							2												<b></b>
EQT165	30D120 - Spent Acid Tank							2					· · · · ·	,					1	T
EQT166	30D130 - Oleum Tank		T	1		<u> </u>													†	
EQT167	30D140 - 99/Oleum/Spent							2											1	1
EQT168	30D150 - 99/Oleum Spent		1					2											1	
EQT169	30D160 - Spent Acid Tank							2						Ì						1
EQT170	30D180 - 93E Tank		1	Г														•		

<b>X.</b> A	Applicable Louisiana and Fede	ral A	ir Q	uali	ty R	equi	ireme	nts					_							
ID	Description									LA	AC 33:	III.Ch	apter			•				
No.:	Description	5 <sup>▲</sup>	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT171	30D190 - Spent Acid Tank				-			2												
EQT173	30D210 - 93E Tank																			
EQT174	30D220 - 99WW Tank .																			
EQT175	30D230 - 99C Tank															1		1		
EQT176	20D120/30D240 - IFS Mix Tank							1									1			
EQT177	40D250 - Treatment Services Tank							1	i "											
EQT178	40D280 - Treatment Services Tank							1												
EQT179	40D290 - Treatment Services Tank							1	1											
EQT180	40D200 - Treatment Services Tank							1	1		1.	1								
EQT181	40D210 - Treatment Services Tank							1												
EQT182	40D300 - Treatment Services Tank							1					}					<b></b>		
EQT183	40D220 - Treatment Services Tank							1			·									
EQT184	30D103 - Sulfur Unloading Tank						· ·				].									
EQT185	M7 - 001 Wastewater Treatment Unit			1														L		
EQT186	1-06 - Rental Boiler	1			1	2	,			T				]					.]	
FUG002	FUG-ACID – Acid Plant Fugitive Emissions					2									3			Ī		
FUG003	FUG-TS – Treatment Services Fugitive Emissions														- 3			1		
GRP002	CAP-SAU - Sulfuric Acid Units 1 & 2	1																	<u> </u>	
GRP021	CAP-Comb - Combustion (Unit 1, Unit 2, Rental Boiler)	1																	<u> </u>	
RLP013	2 - Sulfuric Acid Unit No. 2	1	1		1	1			T									1		<u> </u>
RLP014	3 - Sulfuric Acid Unit No. 1	1			1	1	1	1.					7					1		
PCS001	Spt-Proc - Spent Acid Process	$\top$																1		
PCS002	TS-Proc - TS Process			1														1		
EQT277	13 - Acid Plant Caustic Scrubber	1	1	1		1														
EQT278	U1-Scbr - Unit 1 Tail Gas Scrubber		1															<u> </u>		
EQT279	U2-Scbr - Unit 2 Tail Gas Scrubber	T	1																	
EQT280	U1-Furn - Unit 1 Furnace			1				2								_		1	_	·
EQT281	U2-RFurn - Unit 2 Regen Furnace	T		1				1										Ш		

# Sulfuric Acid Plant – Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

<b>X.</b>	Applicable Louisiana and Fe	deral A	\ir (	Qual	ity F	tequ	ireme	nts							<del>- x - 22</del>	·			7 - Major	
ID	Description									LA	C 33:	III.Ch	apter				<u> </u>			
No.:	Description	5▲	9	11	13	15	1701	2103	2107	2108	2111	2113	2115	2121	2122	2147	2153	51*	56	59*
EQT282	U2-SFurn - Unit 2 Sulfur Furnace	<del>-  </del>		1	<del> </del>	<del>  -</del>				<u> </u>		<u> </u>	·		]	<u> </u>	<u> </u>			<del> </del>
EQT283	U1-Proc - Unit 1 Process			1	1	1							<del> </del>		<del> </del>			<del> </del>	<del> </del>	+
EQT284	U2-Proc – Unit 2 Process			<del></del>		<del>  1</del>	<del>                                     </del>	<u> </u>					<del> </del>		<u> </u>			1	-	<del></del>
EQT291	M10 - Diesel Fire-water Pump			1	1	1		<del>                                     </del>	<del> </del>				-	<del>                                     </del>	<del>                                     </del>	<del> </del>	-	'	ļ <u> </u>	+

<sup>\*</sup> The regulations indicated above are State Only regulations.

#### KEY TO MATRIX

1 -The regulations have applicable requirements that apply to this particular emission source.

-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

-The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source. Blank - The regulations clearly do not apply to this type of emission source.

All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

IX A	pplicable Louisiana and Fed	ier	ai A	ır (	yual	ity	Keg	uire	me	nts																·			
ID No.:	Description				CFR						CFR	61							R 63					10 CF 65	PR		40 CF	2	40 CFR 264
		A	Cd	Db	H	K	Ka	Kb	Α	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	A	С	G	64	68	82	BB
UNF002	Facility Wide	1							1		1		1	1	3			I	1		1						1	1	
ARE002	M4 – West End Sump																												
ARE003	M3 - Treatment Services Sumps																												
EQT008	30D260 - Spent Acid Tank							1																1	1				
EQT140	10 - Preheater; Acid Unit No. 1																								T				
EQT141	11 - Lime Silos					П																			T				
EQT142	12 - Oleum Loading Vent Scrubber																												
EQT146	20 - Sulfur Feed Tank																$\Box$		·							<b></b>			
EQT147	21 - TS Vapor Combustor							1					1				1	1							<del> </del>	<del>                                     </del>			
EQT149	24 - Oleum Barge Loading Scrubber																1						-		<del> </del>	<b></b>			
EQT150	26 - Spent Acid Barge Loading Scrubber																												
EQT151	27 - Acid Plant Vapor Combustor															<del> </del>	11			$\vdash$			1		li	<del>                                     </del>	<del> </del>		-
EQT152	28 - Gasoline Storage Tank				·			3	1							<b></b>								-					
EQT153	6-90 - Package Boiler		<del>                                     </del>	1		1	Τ.									1	$\Box$											-	
EQT154	M1a - Unit 2 Cooling Tower		<b> </b>		· · · ·	1										<u> </u>				3		ļ	$\vdash$		$\vdash$	$\vdash$	<b></b>	<b></b>	
EQT155	M1b - Unit 1 Cooling Tower		i –		<b></b>	1:	<del> </del>		-								1			3			l					<del> </del>	<u> </u>
EQT285	20D380 - Unit 2 Weak Acid Tank					3	3	3	1							<b> </b>	┼╌┤			۲			<u> </u>	<del>                                     </del>	<del>                                     </del>	<u> </u>		<u> </u>	
EQT157	30D030 - Oleum Tank				<b>—</b>	3	3	3	······							<u> </u>				$\vdash$		<u> </u>	<b></b>	<del> </del>	ļ	ļ			
EQT158	30D040 - 93/Oleum		<del>                                     </del>		· · · · · ·	3	3	3	1				<b></b>				1			T			$\vdash$	<b> </b>	†	1		1	
EQT159	30D050 - 99WW Tank		<b></b> -	<del>                                     </del>	<del> </del>	3		3		<b></b>			1			·	$\vdash$			$\vdash$			$\vdash$	1		<del> </del>	-		<b> </b>
EQT161	30D070 - Spent Acid Tank		1			3		1		1			<del></del>				1-			$\vdash$	-			1	1	<del> </del>			1
EQT163	30D100 - Spent Acid Tank		<del>                                     </del>			3		1	1	l	1		1							1				1	1	<del> </del>	<del> </del>	1	
EQT164	30D110 - Spent Acid Tank		† · · · · ·	· · · · ·	<del> </del>	3		1	1	ļ						<b> </b>				1				1	Ť	<del> </del>			
EQT165	30D120 - Spent Acid Tank		1			3	_	1									$\top$			┪		<u> </u>		1	T	-		<b></b>	
EQT166	30D130 - Oleum Tank	<b></b>	1	1	<del> </del>	3		3		1	$\vdash$				·	<b>—</b>	1			<del> </del>	<u> </u>	1			_	<del> </del>		1	
EQT167	30D140 - 99/Oleum/Spent	<b> </b>	1	<u> </u>		3		1	1		† · · · ·		1				1			T	<u> </u>	<del> </del>	$\top$	1	1			1	1
EQT168	30D150 - 99/Oleum Spent					3		1	<u> </u>					$\vdash$		1				1		ļ	T	1	Τī	T .	ļ .		
EQT169	30D160 - Spent Acid Tank				$\vdash$	3	-	ΙÌ	1						<b> </b>	<b>†</b>	1		1			1		1	11	Ť			<del>                                     </del>
EQT170	30D180 – 93E Tank	Т		$\vdash$		3	_	3		t				1	<b></b>	1			1	1	<b> </b>		$\vdash$	T	1	1		1	1
EOT171	30D190 - Spent Acid Tank	1		1	<b> </b>	3		1	1	<b> </b>	1	<del> </del>	1	<del> </del>	l	1	1		-	T		1	T	1	1	1	1	1	†
EQT173	30D210 – 93E Tank				$\vdash$	3		3	<del>                                     </del>	1	1									1			†	† -	† <u> </u>	1	<b> </b>	1	T

IX A	pplicable Louisiana and Fed	der	al A	ir (	Qual	ity	Rec	quir	eme	nts		5.		<del></del>	<b>2874-76</b> 44					<del>2</del>		****	<u></u>			<del></del> -			<del></del>
ID No.:	Description		1		) CFR		I ===				CFR								R 63				l	10 CI 65			40 CF	R	40 CFR 264
200101	10.00	A	Cd	Dь	H	K		Kb	A	J	M	V	FF	A	DD	EEE	F	G*	GGG*	Q	XX*	ZZZZ	Α	C	G	64	68	82	BB
EQT174	30D220 - 99WW Tank					3	3	3	ļ	ļ	<u> </u>		ļ	<u> </u>															
EQT175	30D230 – 99C Tank	<u> </u>		ļ		3	3	3	ļ	ļ	<u> </u>		<u>.</u>																
EQT176	20D120/30D240 - IFS Mix Tank	<b>.</b>				ļ		3	<u> </u>	ļ	ļ		<u> </u>	ļ	ļ,	ļ				_							].		
EQT177	40D250 - Treatment Services Tank			<del>                                     </del>		3	3	1		ļ	<u> </u>		- 1					1											
EQT178	40D280 - Treatment Services Tank					3	- 3	1			<u> </u>		1		<u> </u>			1					•						
EQT179	40D290 - Treatment Services Tank	L				3	3	3					1					1.							-				
EQT180	40D200 - Treatment Services Tank	Ì			l	3	3	1	L				1					1											
EQT181	40D210 - Treatment Services Tank					3	3	3					1	T				1											
EQT182	40D300 - Treatment Services Tank					3	3	3		$\Box$	T		1					1											
EQT183	40D220 - Treatment Services Tank					3	3	3	T				1					1				<del></del>						<b></b>	
EQT184	30D103 - Sulfur Unloading Tank																			<u> </u>				-	<u> </u>	-			
EQT185	M7 – 001 Wastewater Treatment Unit							3											-										
EQT186	1-06 – Rental Boiler			1					<u> </u>		<del> </del>	<b></b> -	<del>                                     </del>	<b></b>	<u> </u>							· · · · · · · · · · · · · · · · · · ·			<u> </u>	÷	<u></u>		
FUG002	FUG-ACID – Acid Plant Fugitive Emissions						•																		1				
FUG003	FUG-TS – Treatment Services Fugitive Emissions							1		1		1	1					. 1						-					. 1
GRP002	CAP-SAU – Sulfuric Acid Units 1 & 2																												
GRP021	CAP-Comb - Combustion (Unit 1, Unit 2, Rental Boiler)																												
RLP013	2 – Sulfuric Acid Unit No. 2	1	1		1#										,	3										1			
RLP014	3 – Sulfuric Acid Unit No. 1	1	1		1#	$\Box$							1			3								-		1			
PCS001	Spt-Proc - Spent Acid Process									T	· · · ·								-			_				<u> </u>			
PCS002	TS-Proc - TS Process		<u> </u>	T								-																	•
EQT277	13 - Acid Plant Caustic Scrubber											· ·					i			<u> </u>									
EQT278	U1-Scbr - Unit 1 Tail Gas Scrubber		<del>                                     </del>						ļ	1										$\vdash$							· · · · · · · · · · · · · · · · · · ·		<u> </u>
EQT279	U2-Scbr - Unit 2 Tail Gas Scrubber	Ì	<b>-</b>							l				1						$\vdash$						<del> </del>			
EQT280	U1-Furn - Unit 1 Furnace		1						1		<b>—</b>		1	<b> </b>				1							ī	<del>                                     </del>			
EQT281	U2-RFurn - Unit 2 Regen Furnace	_	$\vdash$			Н		1	1	<b>T</b>	<b> </b>		Ħ	<del>                                     </del>				i							<del>                                     </del>	<del> </del>		$\vdash \vdash \vdash$	
EQT282	U2-SFurn - Unit 2 Sulfur Furnace		1					-	<b> </b>	$\vdash$								•							<del>                                     </del>	<del>                                     </del>		$\vdash$	

# Sulfuric Acid Plant – Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

IX A	pplicable Louisiana and F	eder	al A	ir Ç	)ual	ity	Rec	<sub>Juire</sub>	me	nts									,									Antonio antonio della comina	
ID No.:	Description			40	CFR	. 60				40	CFR	61					4	0 CF	R 63				4	0 CF 65	R		40 CFF	₹	40 CFR 264
	· ·	A	Cd	Db	Н	K	Ka	Kb	A	J	M	V	FF	Α	DD	EEE	F	G*	GGG*	QX	X* 2	ZZZZ	A	C	G	64	68	82	BB
EQT283	U1-Proc - Unit 1 Process						<u> </u>					<u> </u>						*******			******	***************************************							
EQT284	U2-Proc - Unit 2 Process																·												
EQT291	M10 - Diesel Fire-water Pump					1																1							

<sup>\*</sup>Although a minor source of Hazardous Air Pollutants, the facility is required to comply with the applicable requirements of 40 CFR 63 Subpart GGG, and Subpart XX for streams regulated under these subparts if/when required notice is received from the generator(s) of the regulated material.

#### KEY TO MATRIX

- The regulations have applicable requirements that apply to this particular emission source.
- -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

  Blank The regulations clearly do not apply to this type of emission source.

<sup>&</sup>quot;40 CFR 60 Subpart H requirements are being phased in at different times for RLP013 (January 1, 2011) & RLP014 (May 1, 2012).

<b>X</b>	II. TABLE 2. Explanation for Exemption Status or N	Non-Applicability of a Source
ID No:	Requirement	Notes
UNF002 Facility Wide	40 CFR 63 Subpart DD – National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations 40 CFR 63.680(a)	DOES NOT APPLY – Facility is a minor source of emissions of HAPs.
EQT140, 146, 147, 151, 153, 186, and FUG002 (10, 20, 21, 27, 6-90, 1-06, and FUG-ACID)	Emission Standards for Sulfur Dioxide  LAC 33:III.1503	EXEMPT - units emit less than 250 TPY of sulfur compounds measured as SO <sub>2</sub> .  LAC 33:III.1503.C
EQT150	Control of Emissions of Organic Compounds – Marine Vapor Recovery LAC 33:III. 2108	DOES NOT APPLY – Uncontrolled emissions are less than 100 tpy of VOCs. LAC 33:III.2108.A
26 – Spent Acid Barge Loading Scrubber	Control of Emissions of Organic Compounds – Waste Gas Disposal LAC 33:III.2115	EXEMPT – Waste gas stream has a combined weight of VOCs equal to or less than 100 pounds in any continuous 24 hour period. LAC 33:III.2115.H.1.c
EQT 151 27 – Acid Plant Vapor Combustor	Control of Emission of Organic Compounds  LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQT152 28 – Gasoline Storage Tank	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110b	DOES NOT APPLY – Storage capacity is less than 73 m <sup>3</sup> 40 CFR 60.110b

2	KI. TABLE 2. Explanation for Exemption Status or N	on-Applicability of a Source
ID No:	Requirement	Notes
EQT154 and 155 Mla and Mlb	Emission Standards for Particulate Matter  LAC 33:III.1311.C	EXEMPT – LDEQ has granted an exemption from the opacity standards of LAC 33:III.1311.C as the particulate matter emissions are well below the process rate limitation. LAC 33:III.1311.E
Cooling Towers	40 CFR 63 Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers 40 CFR 63.400	DOES NOT APPLY – The Baton Rouge site does not use chromium-based water treatment chemicals. 40 CFR 63.400(a)
EQT008 Spent Sulfuric Acid Storage Tank	Control of Emission of Organic Compounds  LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
EQTs 161, 163-165, 167- 169, 171 Spent Acid Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978  40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60 Subpart Ka — Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
	Control of Emission of Organic Compounds  LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.

	XI. TABLE 2. Explanation for Exemption Status or N	Ion-Applicability of a Source
ID No:	Requirement	Notes
EQT176 20D120/30D340 – IFS Mix Tank	40 CFR 60 Subpart Kb — Standards of Performance for Storage Volatile Organic Liquid Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY – This tank is grater than 75 m <sup>3</sup> and less than 151 m <sup>3</sup> storing a liquid with a maximum true vapor pressure less than 15.0 kPa. 40 CFR 60.110b(b)
	40 CFR 60.110(b)	·
CRG001 (EQTs 177, 178, 180)  Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60.110	
	40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60.110 (a)	
	LAC 33:III.2103.B – Storage of Volatile Organic Compounds	EXEMPT – Tanks at the Baton Rouge Rhodia, Inc. facility used for the storage of corrosive materials are not required to meet the submerged fill pipe provisions of subsections A and B of LAC 33:III.2103 per LAC 33:III.2103.G.7.
EQTs 179, 181-183 Tanks	40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978	DOES NOT APPLY – These tanks do not store petroleum liquids.
	40 CFR 60.110	

Requirement  Requirement  Results of Performance for Storage dessels for Petroleum Liquids for Which Construction, construction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984  40 CFR 60.110 (a)  Repuirement described for Storage dessels for Petroleum Liquids for Which Construction, construction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984  40 CFR 60.110 (a)	Notes  DOES NOT APPLY – These tanks do not store petroleum liquids.  DOES NOT APPLY – These vessels have a capacity less
FR 60 Subpart Ka – Standards of Performance for Storage Tessels for Petroleum Liquids for Which Construction, construction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984  40 CFR 60.110 (a)  FR 60 Subpart Kb – Standards of Performance for Storage citle Organic Liquid Storage Vessels for Petroleum Liquids	DOES NOT APPLY – These tanks do not store petroleum liquids.  DOES NOT APPLY – These vessels have a capacity less
ressels for Petroleum Liquids for Which Construction, construction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984  40 CFR 60.110 (a)  FR 60 Subpart Kb – Standards of Performance for Storage citle Organic Liquid Storage Vessels for Petroleum Liquids	liquids.  DOES NOT APPLY – These vessels have a capacity less
ile Organic Liquid Storage Vessels for Petroleum Liquids	
r Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	than 75 m <sup>3</sup> . 40 CFR 60.110(b)(a)
40 CFR 60.110(b)	
FR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, construction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978  40 CFR 60.110	DOES NOT APPLY – These tanks do not store petroleum liquids.
FR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, construction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984  40 CFR 60.110 (a)	DOES NOT APPLY – These tanks do not store petroleum liquids.
FR 60 Subpart Kb – Standards of Performance for Storage tile Organic Liquid Storage Vessels for Petroleum Liquids or Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY – These tanks do not store VOLs.
7, 10 F / 10 F t	FR 60 Subpart K – Standards of Performance for Storage essels for Petroleum Liquids for Which Construction, onstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978  40 CFR 60.110  FR 60 Subpart Ka – Standards of Performance for Storage essels for Petroleum Liquids for Which Construction, onstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984  40 CFR 60.110 (a)  FR 60 Subpart Kb – Standards of Performance for Storage file Organic Liquid Storage Vessels for Petroleum Liquids or Which Construction, Reconstruction, or Modification

	XI. TABLE 2. Explanation for Exemption Status or N	on-Applicability of a Source
ID No:	Requirement	Notes
EQT280 Unit 1 Furnace	Control of Emission of Organic Compounds  LAC 33:III.2103.E.	EXEMPT – Compliance with 40 CFR Part 65 will constitute compliance with 2103.
FUG002	Fugitive Emission Control for Ozone Nonattainment Areas  LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCMI facility per LAC 33:III.Chapter 21.Appendix A.
FUG-ACID	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	DOES NOT APPLY – This source does not emit any class I or class II TAPs for which site-wide permitted emissions are over the MER. LAC 33:III.5109.A
FUG003 FUG-TS	Fugitive Emission Control for Ozone Nonattainment Areas  LAC 33:III.2122	DOES NOT APPLY – This facility does not meet the applicability criteria of LAC 33:III.2122.A.1. It is not a SOCMI facility per LAC 33:III.Chapter 21.Appendix A.
RLP013	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCMI for Process Vents, Storage Vessels, Transfer Operations, and Wastewater 40 CFR 63.138)h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements.  40 CFR 63.138(h)
Sulfuric Acid Unit 2	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
	Emission Standards for Sulfur Dioxide LAC 33:III Chapter 15	EXEMPT – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.

# Sulfuric Acid Plant – Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

	XI. TABLE 2. Explanation for Exemption Status or N	on-Applicability of a Source
ID No:	Requirement	Notes
RLP014 Sulfuric Acid Unit 1	40 CFR 63 Subpart G – National Emission Standards for Organic Hazardous Air Pollutants From the SOCMI for Process Vents, Storage Vessels, Transfer Operations, and Wastewater  40 CFR 63.138)h)(2)(i)	EXEMPT – Per 40 CFR 63.138(h), this unit is exempt from the design evaluation or performance test requirements of 40 CFR 63.138(a)(3) and 40 CFR 63.138(j), and from the monitoring requirements of 40 CFR 63.132(a)(2)(iii), and from the associated recordkeeping and reporting requirements.  40 CFR 63.138(h)
	40 CFR 63 Subpart EEE – National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors 40 CFR 63.1200	DOES NOT APPLY – Facility is not subject to this subpart because the Unit 1 and 2 furnaces are not hazardous waste combustors as defined in the subpart. The Unit 1 and 2 furnaces are BIF facilities, not incinerators.
	Emission Standards for Sulfur Dioxide  LAC 33:III Chapter 15	EXEMPT starting on May 1, 2012 – Rhodia complies with LAC 33:III.Chapter 15 by complying with the more stringent requirements set forth in the Consent Decree and 40 CFR 60 Subpart H.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

# Sulfuric Acid Plant – Baton Rouge Facility Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.

- a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (LA MACT Determination for non-HON Facility Equipment Leaks) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.
- b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Sulfuric Acid Plant	LAC 33:III.Chapter 51, LA MACT Determination for non-HON Equipment Leaks	≥5% VOTAP	LA MACT Determination for non-HON Equipment Leaks
· ·	40 CFR 61 Subpart V, National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	≥5% VOHAP	
,	40 CFR 264 Subpart BB, RCRA Subpart BB	≥ 10% Organic	

# General Information

# Al ID: 1314 Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

Also Known As:	מו	Name	User Group	Start Date	
•	2203300033	AFS (EPA Air Facility System)	AFS (EPA Air Facility System)	01-01-2000	
	0840-00033	CDS Number	CDS Number	08-05-2002	
	8215111	EPA EIS Facility Site ID	EPA EIS Facility Site ID	01-01-2008	
	LAD008161234	Rhodia Inc	Hazardous Waste Notification	11-17-1980	
	PMT/PC	GPRA Baselines	Hazardous Waste Permitting	10-01-1997	
	00861	Rhone Ponlenc Basic Chemical Co	Inactive & Abandoned Sites	11-23-1999	
	LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites	11-23-1999	
	LA0005223	LPDES#	LPDES Permit #	05-22-2003	
		Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006	
•	GL-349	Radiation General License	Radiation License Number	12-14-2000	
	LA-338A-N01	Radioactive Material License	Radiation License Number	12-14-2000	
•	G-033-3198	Site ID #	Solid Waste Facility No.	11-21-1999	
	22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge	01-07-2002	
	38329	Stauffer Chemical	TEMPO Merge	11-19-2001	
	38427	Rhodia Inc	TEMPO Merge	01-11-2001	
	70821STFFRAIRLI	TRI#	Toxic Release Inventory	07-19-2004	
hysical Location:	1275 Airline Hwy			Main FAX: 2253593722	
	Baton Rouge, LA 70805			Main Phone: 2253593481	
lailing Address:	1275 Airline Hwy Baton Rouge, LA 70805				
ocation of Front Gate:	30.508417 latitude, -91.1	87938 longitude, Coordinate Method: Lat.\Long - Decimal Degree	es, Coordinate Datum: NAD83	a t	
Related People:	Name	Malling Address	Phone (Type)	Salatianakin	
	Name	maning unappea	r none (13be)	Relationship	
			,	·	
	S. B. "Bala" Balachandrar S. B. "Bala" Balachandrar	n PO Box 828 Baton Rouge, LA 708210828	2253593443 (WF)	Accident Prevention Contact for	
	S. B. "Bala" Balachandrar	n PO Box 828 Baton Rouge, LA 708210828	,	·	
- Company	S. B. "Bala" Balachandrar S. B. "Bala" Balachandrar	n PO Box 828 Baton Rouge, LA 708210828 n PO Box 828 Baton Rouge, LA 708210828	2253593443 (WF) 2253593742 (WP)	Accident Prevention Contact for Accident Prevention Contact for Radiation Contact For	
	S. B. "Bala" Balachandrar S. B. "Bala" Balachandrar Tricia Castille	n PO Box 828 Baton Rouge, LA 708210828 n PO Box 828 Baton Rouge, LA 708210828 PO Box 828 Baton Rouge, LA 70821	2253593443 (WF) 2253593742 (WP) 2253593410 (WP)	Accident Prevention Contact for Accident Prevention Contact for	
	S. B. "Bala" Balachandrar S. B. "Bala" Balachandrar Tricia Castille Tricia Castille	n PO Box 828 Baton Rouge, LA 708210828 n PO Box 828 Baton Rouge, LA 708210828 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821	2253593443 (WF) 2253593742 (WP) 2253593410 (WP) 2253593410 (WP)	Accident Prevention Contact for Accident Prevention Contact for Radiation Contact For Radiation License Billing Party for	
	S. B. "Bala" Balachandrar S. B. "Bala" Balachandrar Tricia Castille Tricia Castille Tricia Castille	PO Box 828 Baton Rouge, LA 708210828 PO Box 828 Baton Rouge, LA 708210828 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821	2253593443 (WF) 2253593742 (WP) 2253593410 (WP) 2253593410 (WP) 2253593410 (WP)	Accident Prevention Contact for Accident Prevention Contact for Radiation Contact For Radiation License Billing Party for Water Billing Party for	
	S. B. "Bala" Balachandrar S. B. "Bala" Balachandrar Tricia Castille Tricia Castille Tricia Castille Tricia Castille	PO Box 828 Baton Rouge, LA 708210828 PO Box 828 Baton Rouge, LA 708210828 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821	2253593443 (WF) 2253593742 (WP) 2253593410 (WP) 2253593410 (WP) 2253593410 (WP) 2253593410 (WP)	Accident Prevention Contact for Accident Prevention Contact for Radiation Contact For Radiation License Billing Party for Water Billing Party for Haz. Waste Billing Party for Responsible Official for	
	S. B. "Bala" Balachandrar S. B. "Bala" Balachandrar Tricia Castille Tricia Castille Tricia Castille Tricia Castille J. Marcus Lewis	PO Box 828 Baton Rouge, LA 708210828 PO Box 828 Baton Rouge, LA 708210828 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821 PO Box 828 Baton Rouge, LA 70821	2253593443 (WF) 2253593742 (WP) 2253593410 (WP) 2253593410 (WP) 2253593410 (WP) 2253593410 (WP) 2253567111 (WP)	Accident Prevention Contact for Accident Prevention Contact for Radiation Contact For Radiation License Billing Party for Water Billing Party for Haz. Waste Billing Party for Responsible Official for	

#### **General Information**

Al ID: 1314 Rhodia Inc

Activity Number: PER20110006 Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

Related People:	Name	Mailing Address	Phone (Type)	Relationship
+ +	John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Accident Prevention Billing Party for
	John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Emission Inventory Facility Contact for
	John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Emission Inventory Facility Contact for
	Daniel Tate	PO Box 828 Baton Rouge, LA 708210828		Responsible Official for
Related Organizations:	Name	Address	Phone (Type)	Relationship
•	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Air Billing Party for
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Operates
	Rhodia Inc	c/o CT Corporation System Baton Rouge, LA 70808	•	Agent of Service for
		:		
	Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Emission Inventory Billing Party

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

#### Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Spent Acid	l Process		···		<u></u>	
ARE 0002	M4 - West End Sump			55 gallons/mo	55 gallons/mo oil skimmed from sump	8760 hr/yr
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	950000 gallons				8760 hr/vr
EQT 0150	26 - Spent Acid Barge Loading Scrubber		800 gallons/min	28.4 MM gallons/yr		1664 hr/yr
EQT 0151	27 - Acid Plant Vapor Combustor		6.7 MM BTU/hr	6.7 MM BTU/hr	Includes Natural Gas and Waste Vent Gas	8760 hr/yr
	30D070 - Spent Acid Tank	125655 gallons				8760 hr/yr
QT 0163	30D100 - Spent Acid Tank	227869 gallons			1	8760 hr/yr
EQT 0164	30D110 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0165	30D120 - Spent Acid Tank	227869 gallons				8760 hr/yr
EQT 0167	30D140 - 99/Oleum/Spent	331612 gallons				8760 hr/yr
QT 0168	30D150 - 99/Oleum/Spent	285198 gallons				8760 hr/yr
EQT 0169	30D160 - Spent Acid Tank	285900 gallons	·			8760·hr/yr
EQT 0171	30D190 - Spent Acid Tank	285318 gallons				8760 hr/yr
EQT 0176	20D120/30D240 - IFS Mix Tank	25000 gallons				8760 hr/yr
EQT 0185	M7 - 001 Wastewater Treatment Unit			330000 gallons/day		8760 hr/yr
	13 - Acid Plant Caustic Scrubber			315 gallons/min	The control device is a scrubber (99% eff. SO2). Works in series with EIQ 151.	2190 hr/yr
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions					8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

#### Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
S Proces					<u></u>	to the second section and
ARE 0003	M3 - Treatment Services Sumps			2500 gallons/day	F	8760 hr/yr
	21 - TS Vapor Combustor		11.6 MM BTU/hr	11.6 MM BTU/hr	Includes Natural Gas and Waste Vent Gas	8760 hr/yr
	40D250 - Treatment Services Tank	157000 gallons				8760 hr/yr
	40D280 - Treatment Services Tank	47000 gallons				8760 hr/yr
	40D290 - Treatment Services Tank	12000 gallons				8760 hr/yr
	40D200 - Treatment Services Tank	47000 gallons				8760 hr/yr
	40D210 - Treatment Services Tank	12000 gallons				8760 hr/yr
	40D300 - Treatment Services Tank	8000 gallons				8760 hr/yr
	40D220 - Treatment Services Tank	8000 gallons				8760 hr/yr
	U1-Scbr - Unit 1 Tail Gas Scrubber			900 tons/day		8760 hr/yr
	U2-Scbr - Unit 2 Tail Gas Scrubber			1900 tons/day		8760 hr/yr
	U1-Furn - Unit 1 Furnace			900 tons/day		8760 hr/yr
QT 0281	U2-RFurn - Unit 2 Regen Furnace			1200 tons/day		8760 hr/yr
QT 0282	U2-SFurn - Unit 2 Sulfur Furnace			700 tons/day		8760 hr/yr
	U1-Proc - Unit 1 Process			900 tons/day		8760 hr/yr
QT 0284	U2-Proc - Unit 2 Process			1900 tons/day		8760 hr/yr
JG 0003	FUG-TS - Treatment Services Fugitive Emissions		· · · · · · · · · · · · · · · · · · ·			8760 hr/yr
LP 0013	2 - Sulfuric Acid Unit No. 2		2280 tons/day	1900 tons/day		8760 hr/yr
LP 0014	3 - Sulfuric Acid Unit No. 1		1080 tons/day	900 tons/day		8760 hr/yr

Al ID: 1314 - Rhodia inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

#### Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Facility Wi	de					
	10 - Preheater; Acid Unit No. 1		6 MM BTU/hr	6 MM BTU/hr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
EQT 0141	11 - Lime Silos		22,5 tons/hr	135 Tons lime/year		6 hr/yr
EQT 0142	12 - Oleum Loading Vent Scrubber		150 gallons/min	2.664 MM gallons/yr		672 hr/yr
	20 - Sulfur Feed Tank	84460 gallons	110 gallons/min	44.6 MM gallons/yr	This stack is equipped with a rain cap. A negligible velocity is used in modeling analyses.	8760 hr/yr
	24 - Oleum Barge Loading Scrubber		600 gallons/min	12.96 MM gallons/yr		400 hr/yr
EQT 0152	28 - Gasoline Storage Tank	1000 gallons	10000 gallons/yr	10000 gallons/yr		8760 hr/yr
	6-90 - Package Boiler		106 MM BTU/hr	50 MM BTU/hr	Natural Gas	8760 hr/yr
EQT 0154	M1a - Unit 2 Cooling Tower		· · · · · · · · · · · · · · · · · · ·	36000 gallons/min		8760 hr/yr
EQT 0155	M1b - Unit 1 Cooling Tower			16000 gallons/min		8760 hr/yr
EQT 0157	30D030 - Oleum Tank	158605 gallons				8760 hr/yr
EQT 0158	30D040 - 93/Oleum	158605 gallons	·····			8760 hr/yr
EQT 0159	30D050 - 99WW Tank	158605 gallons				8760 hr/yr
EQT 0166	30D130 - Oleum Tank	331612 gallons		<u></u>		8760 hr/yr
<b>EQT 0170</b>	30D180 - 93E Tank	285247 gallons				8760 hr/yr
<b>EQT 0173</b>	30D210 - 93E Tank	406414 gallons	:			8760 hr/yr
<b>EQT 0174</b>	30D220 - 99WW Tank	406356 gallons				8760 hr/yr
<b>EQT 0175</b>	30D230 - 99C Tank	1.65 million				8760 hr/yr
		gallons				
	20D103 - Sulfur Unloading Tank	150 gallons				8760 hr/yr
	1-06 - Rental Boiler		133 MM BTU/hr	133 MM BTU/hr		8760 hr/yr
<b>EQT 0285</b>	20D380 - Unit 2 Weak Acid Tank	21000 gallons				8760 hr/yr
<b>EQT 0291</b>	M10 - Diesel Fire-Water Pump		200 horsepower	200 horsepower		500 hr/yr .

#### Stack Information:

ID .	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Spent Acid Process					· · · · · · · · · · · · · · · · · · ·	* **	
ARE 0002 M4 - West En	d Sump	•				<del></del>	72
EQT 0150 26 - Spent Ac	d Barge Loading Scrubber	27.81	1000	.87		13	120
EQT 0151 27 - Acid Plan	t Vapor Combustor	2	2400	5		35	1350
EQT 0185 M7 - 001 Was	tewater Treatment Unit	•					72
FUG 0002 FUG-ACID - A	cid Plant Fugitive Emissions						72
TS Process							
ARE 0003 M3 - Treatmen	nt Services Sumps	4					72

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#### Stack Information:

ID Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
TS Process						
EQT 0147 21 - TS Vapor Combustor	4	6786	6		50	1000
FUG 0003 FUG-TS - Treatment Services Fugitive Emissions	,					72
RLP 0013 2 - Sulfuric Acid Unit No. 2	113.9	108705	4.5		130	90
RLP 0014 3 - Sulfuric Acid Unit No. 1	118.1	50080	3		130	90
Facility Wide						
EQT 0140 10 - Preheater; Acid Unit No. 1	69	13006	2		38	1200
EQT 0141 11 - Lime Silos	6.7	250	.89		55	100
EQT 0142 12 - Oleum Loading Vent Scrubber	4.4	51.84	.5		15	100
EQT 0146 20 - Sulfur Feed Tank	2.7	183.22	1.2		30	284
EQT 0149 24 - Oleum Barge Loading Scrubber	19.7	100	.33		13	72
EQT 0152 28 - Gasoline Storage Tank	0	.02	.33		5	72
EQT 0153 6-90 - Package Boiler	25	14000	3.5		60	850
EQT 0154 M1a - Unit 2 Cooling Tower	25.6	945476	28		46	89
EQT 0155 M1b - Unit 1 Cooling Tower	27.9	526811	20		46	89
EQT 0186 1-06 - Rental Boiler	15.4	22000	5.5		20	470
EQT 0291 M10 - Diesel Fire-Water Pump	6.5	76.8	.5		9.25	355

#### Relationships:

ID	Description	Relationship	ID	Description
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0157	30D030 - Öleum Tank
QT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0158	30D040 - 93/Oleum -
QT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0166	30D130 - Oleum Tank
QT 0142	12 - Oleum Loading Vent Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
QT 0147	21 - TS Vapor Combustor	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
QT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank

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#### Relationships:

ID.	Description	Relationship	ID	Description
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0151	27 - Acid Plant Vapor Combustor	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0184	20D103 - Sulfur Unloading Tank	Vents to	EQT 0146	20 - Sulfur Feed Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	. EQT 0161	30D070 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Vents to	EQT 0151	27 - Acid Plant Vapor Combustor
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0277	13 - Acid Plant Caustic Scrubber	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Vents to	RLP 0014	3 - Sulfuric Acid Unit No. 1
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	Controls emissions from	EQT 0283	U1-Proc - Unit 1 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Controls emissions from	EQT 0284	U2-Proc - Unit 2 Process
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	Vents to	RLP 0013	2 - Sulfuric Acid Unit No. 2
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0165	30D120 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0167	30D140 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0168	30D150 - 99/Oleum/Spent
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0164	30D110 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0163	30D100 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0161	30D070 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0169	30D160 - Spent Acid Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0176	20D120/30D240 - IFS Mix Tank
EQT 0280	U1-Furn - Unit 1 Furnace	Controls emissions from	EQT 0171	30D190 - Spent Acid Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0182	40D300 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0178	40D280 - Treatment Services Tank

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#### Relationships:

ID	Description	Relationship	ID.	Description
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0179	40D290 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0180	40D200 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0177	40D250 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0183	40D220 - Treatment Services Tank
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	Controls emissions from	EQT 0181	40D210 - Treatment Services Tank
EQT 0283	U1-Proc - Unit 1 Process	Controls emissions from	EQT 0280	U1-Furn - Unit 1 Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace
EQT 0284	U2-Proc - Unit 2 Process	Controls emissions from	EQT 0281	U2-RFurn - Unit 2 Regen Furnace

#### Subject Item Groups:

ID	Group Type	Group Description
CRG 0001	Common Requirements Group	CRG001 - 40D250, 40D280, and 40D200
CRG 0002	Common Requirements Group	CRG002 - 40D290, 40D210, 40D300, ard 40D220
CRG 0003	Common Requirements Group	CRG003 - Spent Acid Tanks
CRG 0004	Common Requirements Group	CRG004 - 99/Oleum/Spent Swing Tanks
	Equipment Group	CAP-SAU - SULFURIC ACID UNITS 1 & 2
GRP 0021	Equipment Group	CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)
PCS 0001	Process Group	Spt-Proc - Spent Acid Process
PCS 0002	Process Group	TS-Proc - TS Process
UNF 0002	Unit or Facility Wide	UNF02 - Facility Wide

#### Group Membership:

· ID	Description	Member of Groups
ARE 0002	M4 - West End Sump	PC\$000000001
ARE 0003	M3 - Treatment Services Sumps	PCS0000000002
CRG 0001	CRG001 - 40D250, 40D280, and 40D200	PC\$000000002
CRG 0002	CRG002 - 40D290, 40D210, 40D300, and 40D220	PC\$0000000002
CRG 0003	CRG003 - Spent Acid Tanks	PCS000000001
CRG 0004	CRG004 - 99/Oleum/Spent Swing Tanks	PCS0000000001
EQT 0008	30D260 - Spent Sulfuric Acid Storage Tank	CRG000000003, PCS000000001
EQT 0147	21 - TS Vapor Combustor	PCS0000000002
EQT 0150	26 - Spent Acid Barge Loading Scrubber	PC\$000000001
EQT 0151	27 - Acid Plant Vapor Combustor	PCS0000000001
EQT 0153	6-90 - Package Boiler	GRF0000000021
EQT 0161	30D070 - Spent Acid Tank	CRG000000003, PCS000000001
EQT 0163	30D100 - Spent Acid Tank	CRG000000003, PCS000000001
EQT 0164	30D110 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0165	30D120 - Spent Acid Tank	CRG0000000003, PCS000000001

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#### Group Membership:

1D	Description	Member of Groups
EQT 0167	30D140 - 99/Oleum/Spent	CRG000000004, PCS0000000001
EQT 0168	30D150 - 99/Oleum/Spent	CRG000000004, PCS0000000001
EQT 0169	30D160 - Spent Acid Tank	CRG000000003, PCS000000001
EQT 0171	30D190 - Spent Acid Tank	CRG0000000003, PCS0000000001
EQT 0176	20D120/30D240 - IFS Mix Tank	PCS000000001
EQT 0177	40D250 - Treatment Services Tank	CRG000000001, PCS0000000002
EQT 0178	40D280 - Treatment Services Tank	CRG000000001, PCS0000000002
EQT 0179	40D290 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0180	40D200 - Treatment Services Tank	CRG000000001, PCS0000000002
EQT 0181	40D210 - Treatment Services Tank	CRG000000002, PCS0000000002
EQT 0182	40D300 - Treatment Services Tank	CRG0000000002, PCS0000000002
EQT 0183	40D220 - Treatment Services Tank	CRG0000000002 PCS0000000002
EQT 0185	M7 - 001 Wastewater Treatment Unit	PCS0000000001
EQT 0186	1-06 - Rental Boiler	GRP000000021
EQT 0277	13 - Acid Plant Caustic Scrubber	PCS0000000001
EQT 0278	U1-Scbr - Unit 1 Tail Gas Scrubber	PC\$000000002
EQT 0279	U2-Scbr - Unit 2 Tail Gas Scrubber	PCS0000000002
EQT 0280	U1-Furn - Unit 1 Furnace	PC\$000000002
EQT 0281	U2-RFurn - Unit 2 Regen Furnace	PCS000000002
EQT 0282	U2-SFurn - Unit 2 Sulfur Furnace	PC\$000000002
EQT 0283	U1-Proc - Unit 1 Process	PCS0000000002
EQT 0284	U2-Proc - Unit 2 Process	PCS0000000002
FUG 0002	FUG-ACID - Acid Plant Fugitive Emissions	PCS0000000001
FUG 0003	FUG-TS - Treatment Services Fugitive Emissions	PC\$000000002
RLP 0013	2 - Sulfuric Acid Unit No. 2	GRP000000002, GRP000000021, PC\$000000002
RLP 0014	3 - Sulfuric Acid Unit No. 1	GRP000000002, GRP0000000021, PCS0000000002

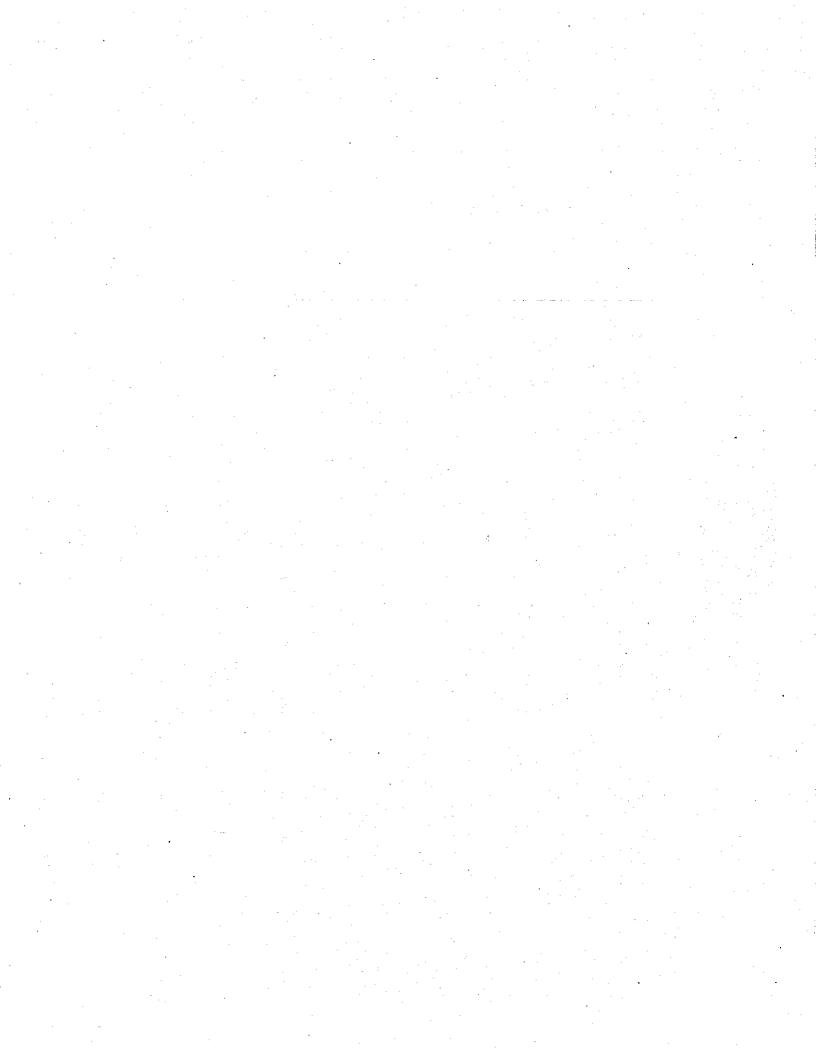
NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

#### Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure	į
0540	0540 Sulphuric Acid Manufacture (Rated Capacity)	2800	tons/day	

#### SIC Codes:

2819	Industrial inorganic chemicals, nec	Al 1314
2819	Industrial inorganic chemicals, nec	UNF 002



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## All phases

	. CO			NOx		PM10		· · · · · · · · · · · · · · · · · · ·	SO2			
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Spent Acid Process	• :									1		
ARE 0002 M4							<del></del>					
EQT 0150 26										0.002	0.03	<0.01
EQT 0151 27	1.69	15.13	7.40	0.29	4.01	1.29	0.01	0.03	0.03	0.01	0.40	0.04
EQT 0185 M7							·	<del></del>				
FUG 0002 FUG-ACID										0.31	· · · · · · · · · · · · · · · · · · ·	1.38
TS Process											;;; - ; · · · · · · · · · · · · · · · ·	
ARE 0003 <sub>M3</sub>												
EQT 0147 21	0.92	6.40	4.04	0.88	6.99	3.85	0.08	0.08	0.37	0.06	0.28	0.25
FUG 0003 FUG-TS												
RLP 0013 2		74.61			134.56	7		23.75				
RLP 0014 3		44.26			63.27			11.25			904.17	
Facility Wide									-			†
EQT 0140	0.47	0.47	2.06	0.56	0.56	2.45	0.04	0.04	0.19	0.03	0.03	0.14
EQT 0141							2.48		0.01			
EQT 0146 20										0.003		0.01
EQT 0152 28												
EQT 0153 6-90		18.76			21.20			1.27			0.58	
EQT 0154 M1a							0.63		2.76			
EQT 0155 M16							0.28		1.23			-
EQT 0186 1-06		3.59			5.05			0.99			80.0	
EQT 0291 M10	1.34		0.33	6.20		1.55	0.44		0.11	0.41		0.10
GRP 0002 cap-sau												

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### All phases

	Voc			Lead	<u> </u>	
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max Ib/hr	Tons/Year
Spent Acid Process						
ARE 0002 M4	0.03		0.14			
EQT 0150 26	1.12	51.40	0.93			
EQT 0151 27	0.45	7.64	1.95	-		,
EQT 0185 M7	0.44		1.91			
FUG 0002 FUG-ACID	0.15		0.65			
TS Process	1					
ARE 0003 M3	0.02	·	0.07		<del>*</del>	
EQT 0147 21	0.21	0.28	0.92			
FUG 0003 FUG-TS	0.67		2.94			
RLP 0013 2		2.73			0.12	
RLP 0014 3		0.94			0.08	
Facility Wide						
EQT 0140	0.03	0,03	0.13			
EQT 0141						
EQT 0146 20	0.004		0.02			
EQT 0152 28	0.07		0.29	-	******	
EQT 0153 6-90	,	2.97				
EQT 0154 M1s						
EQT 0155 M16						
EQT 0186		0.72				
EQT 0291 M10	0.50		0.13			
GRP 0002 CAP-SAU		,		0.02		0.08

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# All phases

· ·	CO			NOx		***	PM10	,		SO2 .		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Facility Wide	1											
GRP 0021 CAP-Comb	20,54		89.98	25.00	114	109.50	12.27		53.73			

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### All phases

	VOC			Lead		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Facility Wide	,					
GRP 0021 CAP-Comb	4.46		19.52	· · · · · · · · · · · · · · · · · · ·		

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

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#### Phase II

:	SO2		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year
TS Process			
RLP 0014 3		904.17	
Facility Wide			
GRP 0021 CAP-Comb	1078.61		4723.13

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

#### **Emission rates Notes:**

GRP 0021	SO2	Avg lb/hr	Phase II is effective from January 1, 2011 through April 30, 2012. Which Months: All Year
GRP 0021	SO2	Tons/Year	Phase II is effective from January 1, 2011 through April 30, 2012. Which Months: All Year
RLP 0014	SO2	Max Ib/hr	Max lbs/hr effective from permit issuance until April 30, 2012. A 3-hour average becomes effective on May 1, 2012. Which Months: All Year

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#### Phase III

	SO2	
Subject Item	Avg lb/hr	Tons/Year
Facility Wide	1	
GRP 0021 CAP-Comb	245.69	1074.94

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

#### **Emission rates Notes:**

GRP 0021	SO2	Avg lb/hr	Phase III becomes effective on May 1, 2012.	Which Months: All Year
GRP 0021	SQ2	Tons/Year	Phase III becomes effective on May 1, 2012.	Which Months: All Year

### **EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0142 12	Sulfuric acid	0.01	0.09	<0.01
EQT 0146	Carbon disulfide	0.004		0.02
•• •	Hydrogen sulfide	0.10		0.44
EQT 0147 21	Chlorine	0.004	0.03	0.02
••	Hydrochloric acid	0.08	0.52	0.36
EQT 0149 24	Sulfuric acid	0.004	0.01	<0.01
EQT 0151	Chlorine	0.005	0.11	0.02
	Hydrochloric acid	0.09	2.24	0.39
EQT 0152	2,2,4-Trimethylpentane	0.001	0.09 0.03 0.52 0.01 0.11	<0.01
-	Вепzепе	0.001		<0.01
	Ethyl benzene	<0.001		<0.01
	Toluene	ic acid 0.09 2  thylpentane 0.001  one 0.001  one 0.001  ced isomers) 0.001  d 0.10  and compounds) 0.005  d compounds) 0.005  d compounds) 0.0041  Fable 51.1) 0.003  and compounds) 0.003		<0.01
	Xylene (mixed isomers)	<0.001		<0.01
	n-Hexane	0.001		<0.01
FUG 0002 FUG-ACID	Sulfuric acid	0.10		0.46
GRP 0002 CAP-SAU	Antimony (and compounds)	0.007		0.032
	Arsenic (and compounds)	0.005		0.022
	Barium (and compounds)	0.041	0.001 <0.001 0.001 0.001 0.001 0.001 0.10 0.007 0.005 0.041 0.003 0.003 0.39	0.181
	Beryllium (Table 51.1)	0.001 <0.001  0.001  0.001  0.10  0.007  0.005  0.041  0.003  0.003  0.39  0.007  0.001	0.012	
e e	Cadmium (and compounds)	0.003		0.012
	Chlorine	0.39		1.70
	Chromium Vi (and compounds)	0.007		0.030
	Cobalt compounds	0.01		. 0.03
	Copper (and compounds)	0.025		0.111
	Hydrochloric acid	0.82		3.59
	Manganese (and compounds)	0.02		0.08
	Mercury (and compounds)	0.003		0.012
	Nickel (and compounds)	0.009		0.038
	Selenium (and compounds)	0.013		0.056
	Sulfuric acid	9.57		41.90
	Zinc (and compounds)	0.05		0.22
PCS 0001	1,1,1-Trichloroethane	0.11		0.50
Spt-Prec	1,1,2,2-Tetrachloroethane	0.005		0.02

## **EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0001	1,1,2-Trichloroethane	0.05		0.20
	1,1-Dichloroethane	0.05 0.11 0.11 0.11 0.11 0.11 0.001 0.001 0.11 0.11 0.11 0.11 0.11 0.005 0.11 0.005 0.11 0.01 0.0		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11	-	0.50
·	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	<0.001		0.001
	1,2-Dichloroethane	0.001		0.002
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	<0.001		0.001
	1,3-Dichloropropene	0.005		0.02
	1,4-Dichlorobenzene	0.11	-	0.50
	1,4-Dioxane	0.01		0.05
er.	2,2'-dichlorodiethylether	0.03		0.11
	2,2,4-Trimethylpentane	0.11		0.50
*	2,4,5-Trichlorophenol	0.11		0.50
	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11	·	0.50
	2,4-Dinitrotoluene	0.002		0.01
	2,4-Toluene diamine	0.11	·	0.50
	2,6-Dinitrotoluene	0.002		0.01
·	2-Acetylaminofluorene	0.11		0.50
	2-nitro-Propane	0.03	· · · · · · · · · · · · · · · · · · ·	0.14
	3,3'-Dichlorobenzidine	0.11		0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11		0.50
	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
•	4-Aminodiphenyl	0.11		0.50
-	4-Dimethylaminoazobenzene	0.11		0.50

# **EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0001 pt-Proc	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.01		0.04
	Acetamide	0.11		0.50
	Acetonitrile	0.06		0.25
	Acetophenone	0.11		0.50
÷	Acrolein	<0.001		0.001
	Acrylamide	<0.001		0.001
•	Acrylic acid	0.005		0.02
•	Acrylonitrile	<0.001		0.002
	Allyl chloride	<0.001		0.001
	Amiben	0.11		0.50
	Ammonia	0.01		0.06
	Aniline	0.01		0.03
	Benzene	0.002		0.01
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
•	Benzyl chloride	0.11		0.50
	Biphenyl	0.002		0.01
	Bromoform	0.11		0.50
•	Butene (mixed isomers)	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
•	Carbaryl	0.11		0.50
	Carbon disulfide	0.03		0.12
	Carbon tetrachloride	0.002		0.01
	Carbonyl sulfide	0.01		0.05
	Chlordane	0.11		0.50
	Chlorine dioxide	<0.001		0.001
	Chloroacetic acid	0.11		0.50
	Chlorobenzene	<0.001		0.001
	Chloroethane	0.11		0.50
	Chloroform	0.002		0.01

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0001 I-Proc	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.03		0.14
	Cresol	0.02		0.08
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
-	Diaminotoluene (mixed isomers)	0.002		0.01
	Diazomethane	0.11		0.50
	Dibutyl phthalate	0.005		0.02
	Dichloromethane	0.01		0.03
5	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
	Epichlorohydrin	0.04		0.17
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.02		0.08
	Ethyl benzene	0.11		0.50
•	Ethylene	0.11		0.50
	Ethylene glycol	0.10		0.45
	Ethylene oxide	<0.001		0.002
	Ethyleneimine	0.11		0.50
	Ethylenethiourea	0.11	•	0.50
	Formaldehyde	0.002		0.01
	Glycol ethers (Table 51.1)	0.01		0.06
	Glycol ethers (Table 51.3)	0.11	•	0.50
	Heptachlor	0.11	,	0.50
	Hexachlorobenzene	0.01		0.04
	Hexachlorobutadiene	<0.001		0.001
	Hexachlorocyclopentadiene	0.11	· · · · · · · · · · · · · · · · · · ·	0.50
	Hexachloroethane	0.01		0.04

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 Spt-Proc	Hexamethylene diisocyanate	0.11	•	0.50
	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	<0.001		0.001
	Hydrofluoric acid	0.002		0.01
	Hydrogen cyanide	0.01	:	0.04
	Hydrogen sulfide	0.002		0.01
	Hydroquinone	0.11		0.50
	Iodomethane	0.11	-	0.50
	Isophorone	0.11		0.50
	Lindane .	0.11		0.50
	Maleic anhydride	0.002		0.01
	Methanot	0.11	·	0.50
•	Methoxychlor	0.11		0.50
	Methyl Isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50
	Methyl chloride	0.09		0.39
	Methyl ethyl ketone	0.11		0.50
•	Methyl isobutyl ketone	0.002		0.01
	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
,	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
•	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
-	Naphthalene (and Methyl naphthalenes)	0.02	***************************************	0.10
	Nitric acid	0.005		0.02
	Nitrobenzene	0.005		0.02
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenol	0.005	1	0.02

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001 pt-Proc	Phosgene	<0.001	:	0.002
	Phosphine	0.11	,,	0.50
••	Phosphorus, Total (as P)	0.11 ,	: . !	0.50
	Phthalic Anhydride	0.005	<u> </u>	0.02
	Polychlorinated biphenyls	0.11		0.50
	Polynuclear Aromatic Hydrocarbons	<0.001		0.001
	Propionaldehyde	0.01		0.04
	Ргорохиг	0.11		0.50
	Propylene	0.11		0.50
	Propylene oxide	0.01		0.04
	Propylenimine	0.11		0.50
	Pyridine	0.01		0.06
	Pyrocatechol	0.11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.02		0.10
• • • • • • • • • • • • • • • • • • • •	Tetrachloroethylene	0.03		0.14
	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50
	Toluene-2,4-diisocyanate	<0.001		0.001
	Toluene-2,6-Diisocyanate	<0.001		0.001
	Toxaphene	0.11		0.50
	Toxic air pollutants (TAP)	0.21	• • • • • • • • • • • • • • • • • • • •	0.59
÷	Trichloroethylene	0.01		0.05
	Triethyl amine	0.11		0.50
•	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.03		0.13
	Vinyl bromide	0.11		0.50
	Vinyl chloride	0.002		0.01
	Vinylidene chloride	0.02		0.08
	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0001	beta-Propriolactone	0.11		0.50
· ·	bis(2-ethylhexyl)phthalate	0.11		0.50
	bis(Chloromethyl)ether	0.11		0.50
	п-Нехапе	0.11		0.50
	n-butyl alcohol	0.11		0.50
	o-Aminoanisole	0.11		0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
·	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11	:	0.50
	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11	·	0.50
PCS 0002	1,1,1-Trichloroethane	0.11		0.50
	1,1,2,2-Tetrachloroethane	0.03		0.12
	1,1,2-Trichloroethane	0.11		0.50
	1,1-Dichloroethane	0.11		0.50
	1,1-Dimethylhydrazine	0.11		0.50
	1,2,4-Trichlorobenzene	0.11		0.50
	1,2-Dibromo-3-chloropropane	0.11		0.50
	1,2-Dibromoethane	0.003		0.011
	1,2-Dichloroethane	0.005		0.021
	1,2-Dichloropropane	0.11		0.50
	1,2-Diphenylhydrazine	0.11		0.50
	1,2-Epoxybutane	0.11		0.50
	1,2-Epoxyethylbenzene	0.11		0.50
	1,2-Oxathiolane 2,2-dioxide	0.11		0.50
	1,3-Butadiene	0.003		0.011
	1,3-Dichloropropene	0.03		0.14
	1,4-Dichlorobenzene	0.11		0.50
•	1,4-Dioxane	0.10		0.44
	2,2'-dichlorodiethylether	0.11		0.50
	2,2,4-Trimethylpentane	0.11		0.50
	2,4,5-Trichlorophenol	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 S-Proc	2,4,6-Trichlorophenol	0.11		0.50
	2,4-Dichlorophenoxyacetic Acid	0.11		0.50
	2,4-Dinitrophenol	0.11	•	0.50
. <u>.</u>	2,4-Dinitrotoluene	0.01		0.03
	2,4-Toluene diamine	0.11		0.50
	2,6-Dinitrotoluene	0.01		0.03
	2-Acetylaminofluorene	0.11		0.50
•	2-nitro-Propane	0.11		0.50
u'	3,3'-Dichlorobenzidine	0.11	. *	0.50
	4,4'-Methylenebis-(2-Chloroaniline)	0.11	-	0.50
•	4,4'-Methylenebisbenzeneamine	0.11		0.50
	4,6 Dinitro-o-cresol	0.11		0.50
	4-Aminodiphenyl	0.11		0.50
	4-Dimethylaminoazobenzene	0.11		0.50
	4-Nitrobiphenyl	0.11		0.50
	4-Nitrophenol	0.11		0.50
	Acetaldehyde	0.07		0.30
	Acetamide	0.11		0.50
	Acetonitrile	0.11		0.50
	Acetophenone	0.11		0.50
	Acrolein	0.003		0.011
	Acrylamide	0.003		0.011
	Acrylic acid	0.04		0.17
	Acrylonitrile	0.003		0.015
	Allyl chloride	0.003	·	0.011
.*	Amiben	0.11		0.50
•	Ammonia	0.11		0.50
	Aniline	0.06	· ·	0.26
	Benzene	0.02		0.10
	Benzidine	0.11		0.50
	Benzotrichloride	0.11		0.50
	Benzyl chloride	0.11	· · · · · · · · · · · · · · · · · · ·	0.50
	Biphenyl	0.01		0.03

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0002 3-Proc	Bromoform	0.11		0.50
	Butene (mixed isomers)	0.11		0.50
	Calcium cyanamide	0.11		0.50
	Captan	0.11		0.50
	Carbaryl	0.11		0.50
	Carbon disulfide	0.11		0.50
	Carbon tetrachloride	0.01		0.03
	Carbonyl sulfide	0.10		0.43
	Chlordane	0.11		0.50
	Chlorine dioxide	0.003		0.011
	Chloroacetic acid	0.11		0.50
•	Chlorobenzene	0.003		0.011
	Chloroethane	0.11		0.50
	Chloroform	0.005		0.02
	Chloromethyl methyl ether	0.11		0.50
	Chloroprene	0.11		0.50
	Cresol	0.11		0.50
	Cumene	0.11		0.50
	Cyanide compounds	0.11		0.50
	Diaminotoluene (mixed isomers)	0.03		0.11
	Diazomethane	0.11	:	0.50
	Dibutyl phthalate	0.04		0.16
	Dichloromethane	0.05		0.23
	Dichlorvos	0.11		0.50
	Diethanolamine	0.11		0.50
	Diethyl Sulfate	0.11		0.50
	Dimethyl formamide	0.11		0.50
	Dimethyl phthalate	0.11		0.50
	Dimethyl sulfate	0.11		0.50
	Dimethylcarbamoyl chloride	0.11		0.50
•	Epichlorohydrin	0.11		0.50
	Ethyl 4,4'-Dichlorobenzilate	0.11		0.50
	Ethyl Acrylate	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max Ib/hr	Tons/Year
CS 0002 3-Proc	Ethyl benzene	0.11		0.50
	Ethylene	0.11		0.50
	Ethylene glycoi	0.11		0.50
	Ethylene oxide	0.003		0.015
	Ethyleneimine	0.11		0.50
e	Ethylenethiourea	0.11	,	0.50
	Formaldehyde	0.03		0.11
	Glycol ethers (Table 51.1)	0.11		0.50
	Glycol ethers (Table 51.3)	0.11		0.50
·	Heptachlor	0.11		0.50
	Hexachlorobenzene	0.08		0.37
	Hexachlorobutadiene	0.003		0.011
	Hexachlorocyclopentadiene	0.11		0.50
	Hexachloroethane	0.07	•	0.30
	Hexamethylene diisocyanate	0.11		0.50
•	Hexamethylphosphoramide	0.11		0.50
	Hydrazine	0.003		0.011
	Hydrofluoric acid	0.005		0.02
	Hydrogen cyanide	0.08		0.34
	Hydrogen sulfide	0.01		0.04
	Hydroquinone	0.11		0.50
	Iodomethane	0.11		0.50
	Isophorone	0.11	-	0.50
	Lindane	0.11		0.50
	Maleic anhydride	0.005		0.02
	Methanol ,	0.11		0.50
•	Methoxychior	0.11		0.50
	Methyl isocyanate	0.11		0.50
	Methyl Tertiary Butyl Ether	0.11		0.50
	Methyl bromide	0.11		0.50
	Methyl chloride	0.11		0.50
	Methyl ethyl ketone	0.11		0.50
• ,	Methyl isobutyl ketone	0.002		0.01

Emission Pt.	Poilutant	Avg lb/hr	Max lb/hr	Tons/Year
CS 0002 5-Proc	Methyl methacrylate	0.11		0.50
	Methylene diphenyl diisocyanate	0.11		0.50
·	Monomethyl hydrazine	0.11		0.50
	N,N-Diethyl aniline	0.11		0.50
	N,N-dimethylbenzenamine	0.11		0.50
	N-Nitroso-N-Methylurea	0.11		0.50
	N-Nitrosodimethylamine	0.11		0.50
	N-Nitrosomorpholine	0.11		0.50
	Naphthalene (and Methyl naphthalenes)	0.11		0.50
	Nitric acid	0.03		0.12
	Nitrobenzene	0.04	_	0.17
	Parathion	0.11		0.50
	Pentachloronitrobenzene	0.11		0.50
	Phenol	0.04		0.16
•	Phosgene	0.003		0.012
	Phosphine	0.11		0.50
	Phosphorus, Total (as P)	0.11		0.50
	Phthalic Anhydride	0.04		0.17
	Polychlorinated biphenyls	0.11		0.50
•	Polynuclear Aromatic Hydrocarbons	0.003		0.011
	Propionaldehyde	0.07		0.30
	Propoxur	0.11		0.50
	Propylene	0.11		0.50
	Propylene oxide	0.07		0.30
	Propylenimine	0.11		0.50
	Pyridine	0.11		0.50
	Pyrocatechol	0,11		0.50
	Quinoline	0.11		0.50
	Quinone	0.11		0.50
	Styrene	0.11		0.50
	Tetrachloroethylene	0.11		0.50
•	Titanium tetrachloride	0.11		0.50
	Toluene	0.11		0.50

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
PCS 0002 S-Proc	Toluene-2,4-diisocyanate	0.003	:	0.011
	Toluene-2,6-Diisocyanate	0.003		0.011
	Toxaphene	0.11		0.50
	Toxic air pollutants (TAP)	0.46		2.03
	Trichloroethylene	0.09		0.38
	Triethyl amine	0.11		0.50
	Trifluralin	0.11		0.50
	Urethane	0.11		0.50
	Vinyl acetate	0.11		0.50
	Vinyl bromide	0.11		0.50
	Vinyl chloride	0.02		0.10
	Vinylidene chloride	. 0.11		0.50
	Xylene (mixed isomers)	0.11		0.50
	alpha-Chloroacetophenone	0.11	<u> </u>	0.50
	beta-Propriolactone	0.11		0.50
	bis(2-ethylhexyl)phthalate	0.11		0.50
•	bis(Chloromethyl)ether	0.11		0.50
	n-Hexane	0.11		0.50
	n-butyl aicohol	0.11		0.50
	o-Aminoanisole	0.11	-	0.50
	o-dianisidine	0.11		0.50
	ortho-Tolidine	0.11		0.50
	ortho-Toluidine	0.11		0.50
	p,p'-DDE	0.11		0.50
•	para-Phenylenediamine	0.11		0.50
	pentachloro-Phenol	0.11		0.50
0013	Antimony (and compounds)		0.671	
•	Arsenic (and compounds)		0.001	
	Barium (and compounds)		1.313	
	Beryllium (Table 51.1)		0.001	
٠.	Cadmium (and compounds)		0.001	
	Chlorine		0.57	
	Chromium VI (and compounds)		0.006	

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
RLP 0013	Cobalt compounds		0.17	
	Copper (and compounds)		0.632	
	Hydrochloric acid		2.12	
	Manganese (and compounds)		0.43	
	Mercury (and compounds)		0.013	
_	Nickel (and compounds)		0.006	
•	Selenium (and compounds)		0.413	
	Sulfuric acid		11.88	
	Zinc (and compounds)		1.24	
RLP 0014	Antimony (and compounds)	-	0.466	
	Arsenic (and compounds)		0.004	
	Barium (and compounds)		0.778	-
	Beryllium (Table 51.1)		<0.001	
	Cadmium (and compounds)		<0.001	
	Chlorine		0.21	
	Chromium VI (and compounds)		0.001	
	Cobalt compounds		0.10	
	Copper (and compounds)		0.379	-
	Hydrochloric acid		14.87	
·	Manganese (and compounds)		0.26	
	Mercury (and compounds)		0.011	
	Nickel (and compounds)		0.003	
,	Selenium (and compounds)		0.373	
	Sulfuric acid		5.63	
	Zinc (and compounds)	•	0.75	,
INF 0002 INF02	1,1,1-Trichloroethane			1.00
111 02	1,1,2,2-Tetrachioroethane			0.14
	1,1,2-Trichloroethane			0.70
	1,1-Dichloroethane			1.00
•	1,1-Dimethylhydrazine			1.00
	1,2,4-Trichlorobenzene			1.00
	1,2-Dibromo-3-chioropropane			1.00
	1,2-Dibromoethane			0.012

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
JNF 0002 JNF02	1,2-Dichloroethane			0.023
· ·	1,2-Dichloropropane	,		1.00
	1,2-Diphenylhydrazine			1.00
	1,2-Epoxybutane			1.00
	1,2-Epoxyethylbenzene		,	1.00
	1,2-Oxathiolane 2,2-dioxide			1.00
	1,3-Butadiene			0.012
	1,3-Dichloropropene			0.16
_	1,4-Dichlorobenzene			1.00
	1,4-Dioxane			0.49
	2,2'-dichlorodiethylether			0.61
	2,2,4-Trimethylpentane			1.01
•	2,4,5-Trichlorophenol			1.00
,	2,4,6-Trichlorophenol			1.00
٠	2,4-Dichlorophenoxyacetic Acid			1.00
	2,4-Dinitrophenol			1.00
4	2,4-Dinitrotoluene			0.04
	2,4-Toluene diamine			1.00
,	2,6-Dinitrotoluene			0.04
	2-Acetylaminofluorene			1.00
	2-nitro-Propane			0.64
	3,3'-Dichlorobenzidine			1.00
	4,4'-Methylenebis-(2-Chloroaniline)			1.00
	4,4'-Methylenebisbenzeneamine			1.00
•	4,6 Dinitro-o-cresol			1.00
7	4-Aminodiphenyl			1.00
	4-Dimethylaminoazobenzene			1.00
	4-Nitrobiphenyl			1.00
	4-Nitrophenol			1.00
	Acetaldehyde			0.34
	Acetamide		·	1.00
	Acetonitrile			0.75
	Acetophenone			1.00

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
INF 0002 NF02	Acrolein			0.012
	Acrylamide			0.012
	Acrylic acid			0.19
•	Acrylonitrile			0.017
	Allyl chloride			0.012
	Amīben			1.00
	Ammonîa			0.56
	Aniline		·	0.29
	Antimony (and compounds)			0.032
	Arsenic (and compounds)			0.022
	Barium (and compounds)			0.181
	Benzene			0.12
	Benzidine			1.00
	Benzotrichloride			1.00
	Benzyl chloride			1.00
	Beryllium (Table 51.1)			0.012
	Biphenyl		•	0.04
	Bromoform			1.00
	Butene (mixed isomers)			1.00
	Cadmium (and compounds)			0.012
	Calcium cyanamide			1.00
	Captan			1.00
	Carbaryl			1.00
	Carbon disulfide			0.64
	Carbon tetrachloride			0.04
•	Carbonyl sulfide			0.48
	Chlordane			1.00
	Chlorine			1.74
	Chlorine dioxide			0.012
	Chloroacetic acid	`		1.00
	Chlorobenzene		-	0.012
	Chloroethane			1.00
•	Chloroform			0.03

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
INF 0002 NF02	Chloromethyl methyl ether		!	1.00
	Chloroprene			0.64
	Chromium VI (and compounds)			0.030
	Cobalt compounds			0.03
	Copper (and compounds)			0.111
	Cresol			0.58
	Cumene			1.00
	Cyanide compounds			1.00
	Díaminotoluene (mixed isomers)			0.12
	Diazomethane			1.00
	Dibutyl phthalate			0.18
	Dichloromethane			0.26
	Dichlorvos			1.00
	Diethanolamine		···	1.00
	Diethyl Sulfate			1.00
	Dimethyl formamide			1.00
	Dimethyl phthalate			1.00
	Dimethyl sulfate			1.00
	Dimethylcarbamoyl chloride			1.00
	Epichlorohydrin			0.67
	Ethyl 4,4'-Dichlorobenzilate			1.00
. 😯	Ethyl Acrylate			0.58
	Ethyl benzene	· ·	<u></u>	1.01
	Ethylene			1.00
	Ethylene glycol			0.95
	Ethylene oxide			0.017
	Ethyleneimine		· · · · · · · · · · · · · · · · · · ·	1.00
•	Ethylenethiourea			1.00
	Formaldehyde			0.12
	Glycol ethers (Table 51.1)			0.56
	Glycol ethers (Table 51.3)			1.00
	Heptachlor			1.00
	Hexachlorobenzene			0.41

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
INF 0002 INF02 .	Hexachiorobutadiene			0.012
	Hexachlorocyclopentadiene			1.00
	Hexachloroethane			0.34
	Hexamethylene diisocyanate		_	1.00
	Hexamethylphosphoramide			1.00
	Hydrazine			0.012
	Hydrochloric acid			4.34
	Hydrofluoric acid			0.03
	Hydrogen cyanide			0.38
·	Hydrogen sulfide			0.49
	Hydroquinone			1.00
	Iodomethane			1.00
	Isophorone			1.00
	Lindane			1.00
	Maleic anhydride			0.03
	Manganese (and compounds)			0.08
	Mercury (and compounds)			0.012
	Methanol			1.00
	Methoxychlor			1.00
	Methyl Isocyanate			1.00
,	Methyl Tertiary Butyl Ether			1.00
	Methyl bromide			1.00
•	Methyl chloride			0.89
	Methyl ethyl ketone		-	1.00
	Methyl isobutyl ketone			0.02
•	Methyl methacrylate			1.00
	Methylene diphenyl diisocyanate			. 1.00
	Monomethyl hydrazine			1.00
•	N,N-Diethyl aniline			1.00
	N,N-dimethylbenzenamine	-		1.00
	N-Nitroso-N-Methylurea			1.00
	N-Nitrosodimethylamine			1.00
	N-Nitrosomorpholine		· · · · · · · · · · · · · · · · · · ·	1.00

Emission Pt.	Pollutant	Avg lb/hr	Max (b/hr	Tons/Year
INF 0002 INF02	Naphthalene (and Methyl naphthalenes)			0.60
•	Nickel (and compounds)			0.038
	Nitric acid			0.14
	Nitrobenzene			0.19
	Parathion			1.00
	Pentachloronitrobenzene	i		1.00
	Phenol		•	0.18
	Phosgene		····	0.014
	Phosphine		-	1.00
	Phosphorus, Total (as P)			1.00
	Phthalic Anhydride			0.19
	Polychlorinated biphenyls			1.00
	Polynuclear Aromatic Hydrocarbons			0.012
	Propionaldehyde			0.34
:	Propoxur	·		1.00
	Propylene			1.00
	Propylene oxide			0.34
-	Propylenimine		:	1.00
	Pyridine			0.56
•	Pyrocatechol			1.00
	Quinoline			1.00
	Quinone			1.00
	Selenium (and compounds)		_	0.056
	Styrene			0.60
,	Sulfuric acid			42.38
	Tetrachloroethylene	·		0.64
	Titanium tetrachloride		-	1.00
	Toluene		·	1.01
	Toluene-2,4-diisocyanate			0.012
	Toluene-2,6-Diisocyanate			0.012
	Toxaphene			1.00
	Trichloroethylene			0.43
•	Triethyl amine			1.00

Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
JNF 0002 JNF02	Trifluralin			1.00
···· <del></del>	Urethane			1.00
	Vinyl acetate			0.63
	Vînyl bromide			1.00
	Vinyl chloride			0.11
	Vinylidene chloride			0.58
	Xylene (mixed isomers)		-	1.01
	Zinc (and compounds)			0.22
·	alpha-Chloroacetophenone			1.00
	beta-Propriolactone			1.00
	bis(2-ethylhexyl)phthalate			1.00
•	bis(Chloromethyl)ether			1.00
	n-Hexane			1.01
,	n-butyl alcohol			1.00
	o-Aminoanisole			1.00
	o-dianisidine			1.00
	ortho-Tolidine			1.00
	ortho-Toluidine			1.00
	p,p'-DDE			1.00
	para-Phenylenediamine			1.00
	pentachloro-Phenoi			1.00

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

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Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

#### Group: PCS 0001 Spent Acid Process

Group Members: ARE 0002 CRG

CRG 0004 EQT 0008EQT 0150EQT 0151EQT 0161EQT 0163EQT 0164EQT 0165EQT 0167EQT 0168EQT 0169EQT 0171EQT 0176EQT 0185EQT 0277FUG 0002

E 0002 MA West End Sun

0003

ARE 0002 M4 - West End Sump

1 [LAC 33:III.5107.A.2]

Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### CRG 0003 CRG003 - Spent Acid Tanks

Group Members: EQT 0008EQT 0161EQT 0163EQT 0164EQT 0165EQT 0169EQT 0171

2 [40 CFR 60.110b(e)] Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e),

(f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]

3 [40 CFR 65.145(c)(2)] Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent

(Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]

Which Months: All Year Statistical Basis: None specified

4 [40 CFR 65.42(b)(5)] Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet

emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction.

Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]

5 [40 CFR 65.47(b)] Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of

the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40

CFR 65.47(b)]

#### CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

Group Members: EQT 0167 EQT 0168

6 [40 CFR 60.110b(e)] Complies with 40 CFR 60 Subpart Kb by complying with 40 CFR 65 Subparts C and G. Monitoring requirements of 40 CFR 60.116b(c), (e),

(f)(1), and (g) still apply. Subpart Kb. [40 CFR 60.110b(e)]

7 [40 CFR 65.145(c)(2)] Equipment/operational data monitored by technically sound method at the approved frequency. Monitor the disposition of spent acid tank vent

(Sulfuric Acid Unit No. 1 versus APVC). Subpart G. [40 CFR 65.145(c)(2)]

Which Months: All Year Statistical Basis: None specified

8 [40 CFR 65.42(b)(5)] Operate and maintain a closed vent system and a control device. Ensure that the control device is designed and operated to reduce inlet

emissions of regulated material by 95% or greater, except during periods of planned routine maintenance or during a control system malfunction.

Ensure that periods of planned routine maintenance do not exceed 240 hours per year. Subpart C. [40 CFR 65.42(b)(5)]

9 [40 CFR 65.47(b)] Equipment/operational data recordkeeping by electronic or hard copy once initially. Keep readily accessible records showing the dimensions of

the storage vessel and an analysis of the capacity of the storage vessel. Keep records as long as the storage vessel is in operation. Subpart C. [40]

CFR 65.47(b)]

TPOR0147

Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

#### Group: PCS 0001 Spent Acid Process

#### CRG 0004 CRG004 - 99/Oleum/Spent Swing Tanks

10 [LAC 33:III.501.C.6]

The requirements listed under CRG004 for the 99/Oleum/Spent Swing Tanks (EQT167 & EQT168) only apply when these tanks are in Spent Acid Service.

#### EQT 0150 26 - Spent Acid Barge Loading Scrubber

11	[LAC 33:HI.501.C.6]	pH recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. Because this scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubber unit. All specific requirements and emission limits will continue to apply. STATE ONLY.
12	[LAC 33:III.501.C.6]	Pressure recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
13	[LAC 33:III.501.C.6]	Pressure monitored by pressure instrument once every four hours when barge vents are routed to scrubber. STATE ONLY.  Which Months: All Year Statistical Basis: None specified
14	[LAC 33:III.501.C.6]	Packed Column Spray Nozzle Pressure >= 15 psig when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY.
15	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: Four-hour average
13	[LAC 33.111.301.C.0]	This scrubber is a portable unit, permittee may occasionally move it and substitute a different scrubbber unit. All specific requirmenmts and emission limits will continue to apply.
16	[LAC 33:III.501.C.6]	pH >= 10 s.u. when barge vents are routed to scrubber. Permittee is allowed one excused excursion per semi-annual period. STATE ONLY. Which Months: All Year Statistical Basis: Four-hour average
17	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
18	[LAC 33:III.501.C.6]	pH monitored by pH instrument once every four hours when barge vent are routed to scrubber. STATE ONLY.
19	[LAC 33:III.5107.A.2]	Which Months: All Year Statistical Basis: None specified Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B. STATE ONLY.

#### EQT 0151 27 - Acid Plant Vapor Combustor

20 [40 CFR 65.145(a)]	Temperature >= 1512 F when regulated tanks are venting to the APVC; or VOC, Total >= 95 % destruction removal efficiency (DRE) when
	calculated by time-weighted average factoring in the amount of time vented to Sulfuric Acid Unit No. 1 (RLP 014). Subpart G. [40 CFR
	65.145(a)]
	Which Months: All Year Statistical Basis: Daily average
21 [40 CFR 65.145(a)]	The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan
	remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control

device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]

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Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

### Group: PCS 0001 Spent Acid Process

#### EQT 0151 27 - Acid Plant Vapor Combustor

		apor compactor
22	2 [40 CFR 65.145(c)(1)]	Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65. Subpart G. [40 CFR 65.145(c)(1)]
23	3 [40 CFR 65.145(c)(2)]	Temperature monitored by temperature monitoring device at the approved frequency. Monitor the firebox temperature. Subpart G. [40 CFR 65.145(c)(2)] Which Months: All Year Statistical Basis: Daily average
24	4 [40 CFR 65.163]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.
2:	5 [40 CFR 65.5(c)]	Submit Startup, Shutdown, and Malfunction Report: Due by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate), unless the information is submitted with the periodic report. Include the information specified in 40 CFR 65.6(c)(1) through (c)(4), as appropriate. Subpart A. [40 CFR 65.5(c)]
2	6 [40 CFR 65.5(e)]	Submit Periodic Report: Due semiannually, no later than 60 calendar days after the end of each six-month period. Include all information specified in subparts of 40 CFR 65 and in 40 CFR 65.5(f). Subpart A. [40 CFR 65.5(e)]
2'	7 [40 CFR 65.6(b)(1)]	Develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the regulated source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Address routine or otherwise predictable CPMS malfunctions. Develop the plan by the regulated source's implementation date as specified in 40 CFR 65.1(f), or for sources referenced from 40 CFR 63 Subpart F, by the compliance date specified in 40 CFR 63 Subpart F. Subpart A. [40 CFR 65.6(b)(1)]
2	8 [LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
. 2	9 [LAC 33:III.1311.C]	Which Months: All Year Statistical Basis: None specified  Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
3	0 [LAC 33:III.5107.A.2]	Which Months: All Year Statistical Basis: Six-minute average Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### EQT 0176 20D120/30D240 - IFS Mix Tank

31	[LAC 33:III.2103.A]	Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure
•		greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
32	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:IIÏ.2103.I.1 - 7, as applicable.

TPOR0147

Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

#### Group: PCS 0001 Spent Acid Process

#### EQT 0176 20D120/30D240 - IFS Mix Tank

33 [LAC 33:III.5107.A.2]

Emits Class I and/or Class II and/or Class III TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### EQT 0185 M7 - 001 Wastewater Treatment Unit

34 [LAC 33:III.5107.A.2]

Emits Class III TAP (via process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### EQT 0277 13 - Acid Plant Caustic Scrubber

35	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
36	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
37	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device continuously only when venting to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
38	[LAC 33:III.501.C.6]	$pH \ge 7$ s.u. when venting to scrubber. STATE ONLY.
	<b></b> . <b>-</b>	Which Months: All Year Statistical Basis: Four-hour average
- 39	[LAC 33:III.501.C.6]	pH monitored by pH instrument continuously only when venting to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
40	[LAC 33:III.501.C.6]	pH recordkeeping by electronic or hard copy once every 15 minutes only when venting to scrubber. STATE ONLY.
41	[LAC 33:III.501.C.6]	Flow rate >= 315 gallons/min when venting to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
42	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
	•	specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
43	[LAC 33:III.905]	Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a
		property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the
		facilities, even though the ambient air quality standards in affected areas are not exceeded.

#### FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

44 [40 CFR 65.143(a)(1)]	Ensure that each closed vent system is designed and operated to collect the regulated material vapors from the emission point and to route the
	collected vapors to a control device. Subpart G. [40 CFR 65.143(a)(1)]
45 [40 CFR 65.143(a)(2)]	Operate closed vent systems at all times when emissions are vented to them. Subpart G. [40 CFR 65.143(a)(2)]

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## Group: PCS 0001 Spent Acid Process

#### FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

	TOUR TOUR	tunt i ugitate almosterio
46	[40 CFR 65.143(a)(3)(ii)]	Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the non-diverting position
		and the vent stream is not diverted through the bypass line. Subpart G. [40 CFR 65.143(a)(3)(ii)]
		Which Months: All Year Statistical Basis: None specified
47	[40 CFR 65.143(a)(3)(ii)]	Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart G. [40 CFR
		65.143(a)(3)(ii)]
48	[40 CFR 65.143(b)(1)(i)(A)]	Closed vent system (hard piping): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency, as
	•	specified in 40 CFR 65.143(c). Subpart G, [40 CFR 65.143(b)(1)(i)(A)]
		Which Months: All Year Statistical Basis: None specified
49	[40 CFR 65.143(b)(1)(i)(B)]	Closed vent system (hard piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR
		65.143(b)(1)(i)(B)]
		Which Months: All Year Statistical Basis: None specified
50	[40 CFR 65.143(b)(1)(ii)]	Closed vent system (ductwork): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, as specified in 40
		CFR 65.143(c). Subpart G. [40 CFR 65.143(b)(1)(ii)]
		Which Months: All Year Statistical Basis: None specified
51	[40 CFR 65.143(b)(2)(i)]	Closed vent system (unsafe to inspect): Determine that the equipment is unsafe to inspect because inspecting personnel would be exposed to an
•	-	imminent or potential danger as a consequence of complying with 40 CFR 65.143(b)(1). Comply with this requirement instead of the
	• •	requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(2)(i)]
52	[40 CFR 65.143(b)(2)(ii)]	Closed vent system (unsafe to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency.
		Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-monitor times but not more
		frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR
		65.143(b)(2)(ii)]
		Which Months: All Year Statistical Basis: None specified
53	[40 CFR 65.143(b)(3)(i)]	Closed vent system (difficult to inspect): Determine that the equipment cannot be inspected without elevating the inspecting personnel more than
		2 meters (7 feet) above a support surface. Comply with this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40
	140 GED 65 1424 VOV(**)	CFR 65.143(b)(3)(i)]
54	[40 CFR 65.143(b)(3)(ii)]	Closed vent system (difficult to inspect): VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Comply with
		this requirement instead of the requirements in 40 CFR 65.143(b)(1). Subpart G. [40 CFR 65.143(b)(3)(ii)]
	[40 CED 65 142(4)(1)]	Which Months: All Year Statistical Basis: None specified
23	[40 CFR 65.143(d)(1)]	Closed vent system: Eliminate indications of a leak, or monitor the equipment according to the provisions in 40 CFR 65.143(c), if there are
	<u>.</u>	visible, audible or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 65.143(b)(1)(i)(B). Subpart G.
	[40 CFR 65.143(d)(2)]	[40 CFR 65.143(d)(1)] Closed vent system: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15
20	[TO CFR 03.143(u)(2)]	calendar days after each leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later, except as
		specified in 40 CFR 65.143(d)(3). Subpart G. [40 CFR 65.143(d)(2)]
		spoortion in to oric operation, propertion (to other operation) and operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operation of the operat

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Activity Number: PER20110006 Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

#### Group: PCS 0001 Spent Acid Process

#### FUG 0002 FUG-ACID - Acid Plant Fugitive Emissions

Closed vent system: Complete repairs as soon as practical, but not later than the end of the next closed vent system shutdown, if repair of a leak is technically infeasible without a closed vent system shutdown, or if it is determined that emissions from immediate repair would be greater than the emissions likely to result from delay of repair. Subpart G. [40 CFR 65.143(d)(3)]

[40 CFR 65.163] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.

[LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

Emits Class III TAP (via this source and process group PCS0001), and emits Class I and/or Class II TAP (via process group PCS0001) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1

or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### Group: PCS 0002 TS Process

[LAC 33:III.5107.A.2]

Group Members: ARE 0003 CRG CRG EQT 0147 EQT 0177 EQT 0178 EQT 0179 EQT 0180 EQT 0181 EQT 0182 EQT 0183 EQT 0278 EQT 0279 EQT 0280 EQT 0281 EQT 0282 EQT 0283 EQT 0284 0001 0002

FUG 0003 RLP 0013 RLP 0014

#### ARE 0003 M3 - Treatment Services Sumps

Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

#### CRG 0001 CRG001 - 40D250, 40D280, and 40D200

Group Members: EOT 0177EOT 0178EOT 0180

62 [40 CFR 60.112b(a)(3)(i)] Closed vent system: Design to collect all VOC vapors and gases discharged from the storage vessel. Subpart Kb. [40 CFR 60.112b(a)(3)(i)]

VOC, Total >= 95 % reduction efficiency using a closed vent system and control device. Sulfuric Acid Unit No. 2 serves as the primary control

device for these tanks. The TS Vapor Combustor serves as the secondary control device for these tanks. Subpart Kb. [40 CFR

60.112b(a)(3)(ii)]

Which Months: All Year Statistical Basis: None specified

64 [40 CFR 60.116b(b)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimension of

the storage vessel and an analysis showing the capacity of the storage vessel. Keep copies of all records for the life of the source as specified by

40 CFR 60.116b(a). Subpart Kb. [40 CFR 60.116b(b)]

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#### Group: PCS 0002 TS Process

#### CRG 0001 CRG001 - 40D250, 40D280, and 40D200

CKG	0001 CRG001 - 40D250,	40D200, and 40D200
65	[40 CFR 61.343(a)(1)(i)(A)]	Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
65	[40 CFR 61.343(a)(1)(i)(B)]	Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
67	[40 CFR 61.343(a)(1)]	Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
68	[40 CFR 61.343(c)]	Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)] Which Months: All Year Statistical Basis: None specified
69	[40 CFR 61.343(d)]	Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
70	[40 CFR 61.349(a)(1)(iii)]	Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
71	[40 CFR 61.355]	Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
72	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
73	[40 CFR 63.133(a)(2)(i)]	Operate and maintain a fixed roof and a closed-vent system that routes the organic hazardous air pollutants vapors vented from the wastewater tank to a control device. Subpart G. [40 CFR 63.133(a)(2)(i)]
74	[40 CFR 63.133(b)(1)(i)]	Fixed roof: Maintain in accordance with the requirements specified in 40 CFR 63.148, except as provided in 40 CFR 63.133(b)(4). Subpart G. [40 CFR 63.133(b)(1)(i)]
75	[40 CFR 63.133(b)(1)(ii)]	Fixed roof: Maintain each opening in a closed position at all times that the wastewater tank contains a Group 1 wastewater stream or residual removed from a Group 1 wastewater stream except when it is necessary to use the opening for wastewater sampling, removal, or for equipment inspection, maintenance, or repair. Subpart G. [40 CFR 63.133(b)(1)(ii)]
76	[40 CFR 63.133(f)]	Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)] Which Months: All Year Statistical Basis: None specified
; 77	[40 CFR 63.133(g)]	Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3). Subpart G. [40 CFR 63.133(g)]  Which Months: All Year Statistical Basis: None specified
78	[40 CFR 63.143(a)]	Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]

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#### Group: PCS 0002 TS Process

### CRG 0001 CRG001 - 40D250, 40D280, and 40D200

79 .[LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
80 [LAC 33:III.2103.E]	Which Months: All Year Statistical Basis: None specified
	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place. Routed to Sulfuric Acid Unit No. 2 or TS Vapr Combustor.
81 [LAC 33:III.2103.H.2]	Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
82 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

### CRG 0002 CRG002 - 40D290, 40D210, 40D300, and 40D220

#### Group Members: EQT 0179 EQT 0181 EQT 0182 EQT 0183

	83	[40 CFR 61.343(a)(1)(i)(A)]	Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR
			61.355(h). (Method 21). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]
-	84	[40 CFR 61.343(a)(1)(i)(B)]	Fixed roof: Maintain each opening in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair, except as specified in 40 CFR 61.343(a)(1)(i)(C). Subpart FF. [40 CFR 61.343(a)(1)(i)(B)]
	85	[40 CFR 61.343(a)(1)]	Install, operate, and maintain a fixed-roof and closed-vent system that routes all organic vapors vented from the tank to a control device. Subpart FF. [40 CFR 61.343(a)(1)]
	86	[40 CFR 61.343(c)]	Fixed-roof: Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter to ensure that no cracks or gaps occur and that access doors and other openings are closed and gasketed properly. Subpart FF. [40 CFR 61.343(c)] Which Months: All Year Statistical Basis: None specified
	87	[40 CFR 61.343(d)]	Make first efforts at repair as soon as practicable, but not later than 45 calendar days after a broken seal or gasket or other problem is identified, or when detectable emissions are measured, except as provided in 40 CFR 61.350. Subpart FF. [40 CFR 61.343(d)]
	88	[40 CFR 61.349(a)(1)(iii)]	Closed-vent system: Ensure that all gauging and sampling devices are gas-tight except when gauging or sampling is taking place. Subpart FF. [40 CFR 61.349(a)(1)(iii)]
	89	[40 CFR 61.355]	Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
	90	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
	91	[40 CFR 63.133(a)(1)]	Operate and maintain a fixed roof. Subpart G. [40 CFR 63.133(a)(1)]

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### Group: PCS 0002 TS Process

CRG 0002	CRG002 - 40D290, 40D210, 40D300, and 40	D220
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92	[40 CFR 63.133(f)]	Equipment/operational data monitored by technically sound method once initially and once every six months. Monitor for improper work practices in accordance with 40 CFR 63.143, except as specified in 40 CFR 63.133(e). Subpart G. [40 CFR 63.133(f)]
93	[40 CFR 63.133(g)]	Which Months: All Year Statistical Basis: None specified Equipment/operational data monitored by technically sound method at the regulation's specified frequency. Inspect each wastewater tank for control equipment failures as defined in 40 CFR 63.133(g)(1)(i) through (g)(1)(ix) according to the schedule in 40 CFR 63.133(g)(2) and (g)(3).
•	F40 CPD (2.142( ))	Subpart G. [40 CFR 63.133(g)] Which Months: All Year Statistical Basis: None specified
94	[40 CFR 63.143(a)]	Comply with the inspection requirements in 40 CFR 63 Subpart G Table 11. Subpart G. [40 CFR 63.143(a)]
95	[LAC 33:III.2103.A]	Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.
96.	[LAC 33:III.2103.H.3]	If required, Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
97	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

#### EQT 0147 21 - TS Vapor Combustor

98	[40 CFR 60.112b(a)(3)(ii)]	VOC, Total >= 95 % reduction efficiency using a closed vent system and control device. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)] Which Months: All Year Statistical Basis: Three-hour average
99	[40 CFR 60.113b(c)(2)]	Equipment/operational data monitored by the regulation's specified method(s) at the regulation's specified frequency. Monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of
		this section, unless the plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
	,	Which Months: All Year Statistical Basis: None specified
100	[40 CFR 60.115b(c)(1)]	Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
101	[40 CFR 60.115b(c)(2)]	Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60:113b(c)(2).  Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60:115b(c)(2)]
102	[40 CFR 61.349(a)(2)(i)(C)]	Residence time >= 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F). Subpart FF. [40 CFR 61.349(a)(2)(i)(C)] Which Months: All Year Statistical Basis: None specified
103	[40 CFR 61.349(f)]	Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose
		connections. Subpart FF. [40 CFR 61.349(f)]
		Which Months: All Year Statistical Basis: None specified
104	[40 CFR 61.354(c)(1)]	Temperature monitored by temperature monitoring device continuously. Install the temperature sensor at a representative location in the combustion chamber. Subpart FF. [40 CFR 61.354(c)(1)]

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Which Months: All Year Statistical Basis: None specified

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## Group: PCS 0002 TS Process

### EQT 0147 21 - TS Vapor Combustor

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105	[40 CFR 61.354(c)]	Inspect the firebox temperature results daily to ensure proper operation. Subpart FF. [40 CFR 61.354(c)]
106	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two
		years from the date the information is recorded unless otherwise specified. Subpart FF.
107	[40 CFR 63.139(b)]	Ensure that the control device is operating whenever organic hazardous air pollutants emissions are vented to the control device. Subpart G. [40 CFR 63.139(b)]
108	[40 CFR 63.139(c)(1)(iii)]	Residence time >= 0.5 sec at a minimum temperature of 760 degrees C. The TS Vapor Combustor is the secondary control device for TS tanks that are subject to vapor control per 63.133(a)(2) if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.139(c)(1)(iii)]
		Which Months: All Year Statistical Basis: None specified
109	[40 CFR 63.139(d)]	Demonstrate that each control device or combination of control devices achieves the appropriate conditions specified in 40 CFR 63.139(c) by using one or more of the methods specified in 40 CFR 63.138(d)(1), (d)(2), or (d)(3), except as specified in (d)(4). Subpart G. [40 CFR 63.139(d)]
110	[40 CFR 63.143(e)(1)]	Comply with the monitoring requirements specified in 40 CFR 63 Subpart G Table 13. Continuously monitor the firebox temperature. Subpart G. [40 CFR 63.143(e)(1)]
111	[40 CFR 63.143(g)]	The firebox temperature monitoring equipment shall be installed, calibrated, and maintained according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment will monitor accurately. Subpart G. [40 CFR 63.143(g)]
112	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
	-	Which Months: All Year Statistical Basis: None specified
113	[LAC 33:III.1311.C]	Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
		Which Months: All Year Statistical Basis: Six-minute average
114	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
115	[LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency. Vapor loss control system shall be capable of minimum VOC control efficiency of 95%. This
_		limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.  Which Months: All Year Statistical Basis: Three-hour average
116	[LAC 33:III.2103.H.2]	Determine compliance with LAC 33:III.2103.E using the methods in LAC 33:III.2103.H.2.a-e, where appropriate.
117	[LAC 33:III.2103.I]	Equipment/operational data record/spaning by electronic on head course and the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market of the Market
	[2.10 555105.1]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
118	[LAC 33:III.5107.A.2]	Emits Class III TAP (via this source and process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than
<del></del>		the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

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#### Group: PCS 0002 TS Process

#### EQT 0278 U1-Scbr - Unit 1 Tail Gas Scrubber

119 [LAC 33:III.905]

Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

#### EQT 0279 U2-Scbr - Unit 2 Tail Gas Scrubber-

120 [LAC 33:III.905]

Install air pollution control facilities whenever practically, economically, and technologically feasible. When facilities have been installed on a property, use them and diligently maintain them in proper working order whenever any emissions are being made which can be controlled by the facilities, even though the ambient air quality standards in affected areas are not exceeded.

#### EQT 0280 U1-Furn - Unit 1 Furnace

121	[40 CFR 61.342(c)(1)(i)]	Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment
		system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
122	[40 CFR 61.348(e)]	Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as
		indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the
		methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e). [40 CFR 61.348(e), LAC
		33:XII.507.H.1.a]
123	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40
		· CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two
		years from the date the information is recorded unless otherwise specified. Subpart FF.
124	[40 CFR 63.138(h)(2)(i)]	Treat the wastewater stream or residual in a unit identified in, and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply
		with (h)(2) which states a boiler or heater that has been issued a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H.
		Subpart G. [40 CFR 63.138(h)(2)(i)]
125	[40 CFR 65.145(a)]	The owner or operator shall operate and maintain the nonflare control device so that the monitored parameters defined in the monitoring plan
		remain within the ranges specified in the Initial Compliance Status Report whenever emissions of regulated material are routed to the control
		device, except during periods of startup, shutdown, and malfunction. Subpart G. [40 CFR 65.145(a)]
126	[40 CFR 65.145(c)(1)]	Temperature >= 1500 F when spent acid tanks are venting to Sulfuric Acid Unit No. 1. Subpart G. [40 CFR 65.145(c)(1)]
		Which Months: All Year Statistical Basis: None specified
127	[40 CFR 65.145(c)(1)]	Submit a monitoring plan containing the information in 40 CFR 65.165(b) to identify the parameters that will be monitored to assure proper
		operation of the control device, unless previously established under an applicable standard prior to the implementation date of 40 CFR 65.
		Subpart G. [40 CFR 65.145(c)(1)]
128	[40 CFR 65.145(c)(2)]	The owner or operator shall monitor the parameters specified in the Initial Compliance Status Report or in the operating permit. Therefore,
		Combustion zone temperature shall be monitored. Records shall be generated as specified in 65.163(b)(1). [40 CFR 65.145(c)(2)]
129	[40 CFR 65.163]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
		specified in 40 CFR 65.163(a) through (e), as applicable. Subpart G.

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#### Group: PCS 0002 TS Process

#### EQT 0280 U1-Furn - Unit 1 Furnace

130 [LAC 33:III.1101.B]

Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60

consecutive minutes.

Which Months: All Year Statistical Basis: None specified

#### EQT 0281 U2-RFurn - Unit 2 Regen Furnace

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131	[40 CFR 60.112b(a)(3)(ii)]	VOC, Total >= 95 % reduction efficiency. Subpart Kb. [40 CFR 60.112b(a)(3)(ii)] Which Months: All Year Statistical Basis: Three-hour average
132	[40 CFR 60.113b(c)(2)]	Equipment/operational data monitored by the regulation's specified method(s) continuously. Monitor the parameters of the closed vent system
		and control device in accordance with the operating plan submitted to DEQ in accordance with 40 CFR 60.113b(c)(1) of this section, unless the
		plan was modified by DEQ during the review process. In this case, the modified plan applies. Therefore, monitor firebox temperature (Regen
		furnace) continuously. Subpart Kb. [40 CFR 60.113b(c)(2)]
	•	Which Months: All Year Statistical Basis: None specified
133	[40 CFR 60.115b(c)(1)]	Operating plan recordkeeping by electronic or hard copy at the approved frequency. Keep copies of all records for the life of the control
104	[40 CER (0.1151/-)(0)]	equipment. Subpart Kb. [40 CFR 60.115b(c)(1)]
134	[40 CFR 60.115b(c)(2)]	Monitoring data recordkeeping by electronic or hard copy upon measurement in accordance with the operating plan of 40 CFR 60.113b(c)(2).
125	F40 CER 61 2424-3/13/37	Keep copies of all records for at least two years. Subpart Kb. [40 CFR 60.115b(c)(2)]
135	[40 CFR 61.342(c)(1)(i)]	Waste streams containing benzene: Remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment
126	[40 CED 41 2494-)]	system that complies with the standards specified in 40 CFR 61.348. Subpart FF. [40 CFR 61.342(c)(1)(i)]
136	[40 CFR 61.348(e)]	Maintain furnace pressure at -0.1 inches of water maximum, 10-second delay. Furnace openings shall operate with no detectable emissions as
		indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the
		methods specified in §61.355(h). Compliance with this requirement assures compliance with 40 CFR 61.348(e), [40 CFR 61.348(e), LAC
137	[40 CFR 61.349(a)(2)(i)(C)]	33:III.507.H.1.a]  Peridama time > 7.05 and at a minimum termonature of 7.00 decrease G (1400 decrease F) in the Proof.
137	[40 Cl K 01:549(a)(2)(i)(C)]	Residence time >= 0.5 sec at a minimum temperature of 760 degrees C (1400 degrees F) in the Regen furnace. Subpart FF. [40 CFR 61.349(a)(2)(i)(C)]
138	[40 CFR 61.349(f)]	Which Months: All Year Statistical Basis: None specified
. 136	[10 01 10 10 10 10 10]	Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of
		ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]
		Which Months: All Year Statistical Basis: None specified
139	[40 CFR 61.354(c)(5)]	Equipment/operational data monitored by technically sound method continuously. Monitor a parameter that indicates good combustion
133	[:0 01:101:50 !(0)(0)]	operating practices are being used. Subpart FF. [40 CFR 61.354(c)(5)]
	•	Which Months: All Year Statistical Basis: None specified
140	[40 CFR 61.354(c)(5)]	Equipment/operational data recordkeeping by recorder continuously. Record a parameter that indicates good combustion operating practices are
	(17 27 27 27 27 (2)(2))	being used. Subpart FF. [40 CFR 61.354(c)(5)]
		game analysis trift a critical (a)(a)1

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#### Group: PCS 0002 TS Process

#### EQT 0281 U2-RFurn - Unit 2 Regen Furnace

141 [40 (777) (1.05/2)	
	ard copy at the regulation's specified frequency. Maintain records as specified in 40 ord in a readily accessible location at the facility site for a period not less than two ise specified. Subpart FF.
142 [40 CFR 63.138(h)(2)(i)] Treat the wastewater stream or residual in a unit identified in,	and complying with, 40 CFR 63.138(h)(1), (h)(2), or (h)(3). Rhodia will comply a final permit under 40 CFR 270 and complies with 40 CFR 266 Subpart H.
143 [40 CFR 63.139(c)(1)(iii)] Route organic hazardous air pollutant emissions to an enclose temperature of 760 degrees C. Unit No. 2 Regen furnace is the state of 760 degrees C.	ed combustion device having a minimum Residence time >= 0.5 sec at a minimum the primary control device for TS tanks that are subject to vapor control per a HON Group 1 wastewtater or residual has been shipped to us. Per 3) and 63.143. Subpart G. [40 CFR 63.139(c)(1)(iii)]
[LAC 33:III.1101.B] Opacity <= 20 percent, except that emissions may have an op consecutive minutes.	acity in excess of 20 percent for not more than one six-minute period in any 60
	system shall be capable of minimum VOC control efficiency of 95% for compliance g periods of planned routine maintenance which may not exceed 240 hours per year.
Which Months: All Year Statistical Basis: Three-hour averaged Determine compliance with LAC 33:III.2103.E using the meter [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or h 33:III.2103.I.1 - 7, as applicable.	

#### EQT 0282 U2-SFurn - Unit 2 Sulfur Furnace

148 [LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60
	consecutive minutes.
	Which Months: All Year Statistical Basis: None specified

#### EQT 0283 U1-Proc - Unit 1 Process

149	[LAC 33:III.1511.E]	Production of Sulfuric acid monitored by technically sound method daily. Monitor the H2SO4 production rate.
		Which Months: All Year Statistical Basis: None specified
150	[LAC 33:III.1513.A.3]	Production of Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H2SO4 production rate.
151	[LAC 33:III.5109.A.1]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.
		MACT applies for metals only and therefore is determined to be compliance with the BIF permit.

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### Group: PCS 0002 TS Process

EQT 0284 U2-Proc - Unit 2 Process		
152 [LAC 33:III.1511.E]	Sulfuric acid monitored by technically sound method daily. Monitor the H2SO4 production rate.	
153 [LAC 33:III.1513.A.3]	Which Months: All Year Statistical Basis: None specified Sulfuric acid recordkeeping by electronic or hard copy daily. Record the H2SO4 production rate.	
154 [LAC 33:III.5109.A.1]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.  MACT applies for metals only and therefore is determined to be compliance with the RIF permit.	

FUG	FUG 0003 FUG-TS - Treatment Services Fugitive Emissions			
155	[40 CFR 60.112b(a)(3)(i)]	Closed vent system (no detectable emissions): VOC, Total < 500 ppm above background as indicated by instrument readings and visual inspections, as determined in Subpart VV, 40 CFR 60.485(c). Subpart Kb. [40 CFR 60.112b(a)(3)(i)]		
•	•	Which Months: All Year Statistical Basis: None specified		
156	[40 CFR 60.112b(a)(3)]	Equip with a closed vent system and control device. Design the closed vent system to collect all VOC vapors and gases discharged from the storage vessel and operate with no detectable emissions. Subpart Kb. [40 CFR 60.112b(a)(3)]		
157	[40 CFR 61.343(a)(1)(i)(A)]	Fixed roof: Ensure that the cover and all openings are designed to operate with no detectable emissions as indicated by an instrument reading less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.343(a)(1)(i)(A)]		
158	[40 CFR 61.345(a)(1)]	Install, operate, and maintain a cover on each container used to handle, transfer, or store waste. Subpart FF. [40 CFR 61.345(a)(1)]		
159	[40 CFR 61.348(e)(3)ii]	If the cover and closed-vent system operates such that the treatment process and wastewater treatment system unit are maintained at a pressure less than atmospheric pressure, the owner or operator may operate the system with an opening that is not sealed and kept closed at all times provided the opening is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 61.355(h). Subpart FF. [40 CFR 61.348(e)(3)ii]		
160	[40 CFR 61.349(a)(1)(i)]	Closed-vent system: Operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h). Subpart FF. [40 CFR 61.349(a)(1)(i)]		
161	[40 CFR 61.349(f)]	Equipment/operational data monitored by visual inspection/determination once initially and once every quarter thereafter. Include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections. Subpart FF. [40 CFR 61.349(f)]		
		Which Months: All Year Statistical Basis: None specified		
162	[40 CFR 61.354(f)(1)]	Closed-vent system (bypass line): Seal or closure mechanism monitored by visual inspection/determination monthly. Check the position of the valve and the condition of the car-seal or closure mechanism required under 40 CFR 61.349(a)(1)(ii) to ensure that the valve is maintained in the		
		closed position and the vent stream is not diverted through the bypass line. Subpart FF. [40 CFR 61.354(f)(1)] Which Months: All Year Statistical Basis: None specified		
163	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two		
		years from the date the information is recorded unless otherwise specified. Subpart FF.		

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### Group: PCS 0002 TS Process

FUC	<u>3 0003</u> FUG-TS - Treatm	nent Services Fugitive Emissions
164	[40 CFR 63.148(c)(1)]	Conduct initial inspection of closed vent system on TS tanks in accordance with Method 21 as specified in 40 CFR 63.148(c)(1). Conduct annual inspection for visible, audible, or olfactory indications of leaks. This requirement only applies if/when notice is received from a customer
165	[40 CFR 63.148(f)(2)]	that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(c)(1)] Vapor collection system or closed vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the closed position and the vent stream is not diverted through the bypass line. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
166	[40 CFR 63.148(f)(2)]	Which Months: All Year Statistical Basis: None specified Vapor collection system or closed vent system (bypass lines): Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. This requirement only applies if/when notice is received from a customer that a HON Group I wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(f)(2)]
167	[40 CFR 63.148(i)]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.148(i)(1) through (i)(6). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(i)]
168	[40 CFR 63.148(j)]	Submit the information specified in 40 CFR 63.148(j)(1) through (j)(3) with the reports required by 40 CFR 63.182(b) of subpart H or 40 CFR 63.152(c). This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G. [40 CFR 63.148(j)]
169	[LAC 33:III.501]	Comply with 40 CFR 264 BB and 40 CFR 61 Subpart V by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines.  Compliance is achieved through compliance with LA MACT Determination for nonHON Sources.
170	[LAC 33:III.5107.A.2]	Emits Class III TAP (via process group PCS0002), and emits Class I and/or Class II TAP (via process group PCS0002) less than the MER (facility wide). Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
17	[LAC 33:III.5109.A]	VOC, Total monitored by technically sound method within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled to determine if it is leaking, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).  Which Months: All Year Statistical Basis: None specified
173	2 [LAC 33:III.5109.A]	Pressure relief device in gas/vapor service: VOC, Total < 500 ppm except during pressure releases, as measured by the method specified in Section P.3, as specified in Section F.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).  Which Months: All Year Statistical Basis: None specified
17:	3 [LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (percent leaking valves <= 2 for two consecutive semiannual leak detection periods): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Paragraph J.2.b of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Optional alternative to quarterly monitoring.

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Which Months: All Year Statistical Basis: None specified

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## Group: PCS 0002 TS Process

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174	[LAC 33:III.5109.A]	Comply with the test methods and procedures in Section P, as specified in Subsections P.1 through P.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
175	[LAC 33:111.5109.A]	Connectors in gas/vapor service and in light liquid service (opened or otherwise had the seal broken): VOC, Total monitored by the regulation's
		specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had
		the seal broken, including those determined to be unrepairable prior to process unit shutdown, as specified in Paragraph O.8.a of the Louisiana
		MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up
		monitoring detects a leak, initiate repair provisions specified in Subsection O.9, unless it is determined to be unrepairable, in which case it is
		counted as unrepairable.
156		Which Months: All Year Statistical Basis: None specified
176	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in VOTAP service and, if the pump is covered by
		standards under NSPS, is not in VOC service, as specified in Paragraph D.4.b of the Louisiana MACT Determination for Non-HON Equipment
177	IT A C 22-TIT 5100 A3	Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
_ 177	[LAC 33:III.5109.A]	Delay of Repair: Repair equipment before the end of the next process unit shutdown, if repair is technically infeasible without a process unit
178	[LAC 33:III.5109.A]	shutdown, as specified in Subsection M.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
170	[EAC 33.III.3103.A]	Pumps in light liquid service (dual mechanical seal system): Equip each barrier fluid system with a sensor that will detect failure of the seal
		system, the barrier fluid system, or both, as specified in Paragraph D.4.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
179	[LAC 33:III.5109.A]	
117	[2.10 20	Connectors in gas/vapor service and in light liquid service (welded completely around the circumference of the interface or physically removed and the pipe welded together): Equipment/operational data monitored by the regulation's specified method(s) within three months after being
		welded. Check the integrity of the weld by monitoring according to the procedures in Section P or by testing using x-ray, acoustic monitoring,
		hydrotesting, or other applicable method, as specified in Subsection O.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks
		(March 30, 1995). Comply with this requirement instead of the requirements in Subsection O.
		Which Months: All Year Statistical Basis: None specified
180	[LAC 33:III.5109.A]	Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: VOC,
	•	Total monitored by the regulation's specified method(s) within 5 days of finding evidence of a potential leak by visual, audible, olfactory, or any
		other detection method, as specified in Section K.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
		Monitor using the method specified in Subsection P.2. If an instrument reading of 10000 ppm or greater for agitators, 2000 ppm or greater for
		pumps or 1000 ppm or greater for valves, connectors, instrument systems, or pressure relief devices is measured, a leak is detected. If a leak is
		detected, initiate repair provisions specified in Subsection K.3.
101	67 4 G 60 777 6100 43	Which Months: All Year Statistical Basis: None specified
181	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service: Repair Leaks as soon as practicable, but not later than 15 calendar days after a leak is
		detected, except as provided in Subsection O.8. Make a first attempt at repair no later than 5 calendar days after each leak is detected. If a leak
		is detected, monitor the for leaks within the first 90 days after its repair, as specified in Subsection O.9 of the Louisiana MACT Determination
÷		for Non-HON Equipment Leaks (March 30, 1995).
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#### Group: PCS 0002 TS Process

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FUG	0003 FUG-TS - Treatn	nent Services Fugitive Emissions
182	[LAC 33:III.5109.A]	Pressure relief device in gas/vapor service: After each pressure release, return to a condition of no leakage, as indicated by an instrument reading of less than 500 ppm, as soon as practicable, but no later than five calendar days after each pressure release, except as provided in Section M, as
183	[LAC 33:III.5109.A]	specified in Section F.2.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).  Identify each piece of equipment in a process unit subject to this MACT determination such that it can be distinguished readily from equipment that is not subject to this MACT determination, as specified in Subsection C.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
184	[LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (skip period leak detection and repair): Notify DEQ 30 days before implementing any of the alternate provisions of Section J, as specified in Subsection R.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
185	[LAC 33:III.5109.A]	Sampling connection systems: Equip with a closed-purge system or closed-vent system, except as provided for in Section C, as specified in Subsection G.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Ensure that this system collects or
186	[LAC 33:III.5109.A]	captures the sample purge for return to the process.  Connectors in gas/vapor service and in light liquid service (percent of leaking connectors > 2): VOC, Total monitored by the regulation's specified method(s) quarterly until good performance is obtained or until four quarterly monitorings have been performed, as specified in
		Subsections O.2 and O.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If good performance has not been obtained after four quarters of monitoring, monitor the remaining unchecked connectors within six months of the last quarterly monitoring period, as specified in Subsection O.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If monitoring of the remaining connectors indicates good performance, monitor in accordance with Subsection O.4. If monitoring of the remaining connectors indicates that good performance has not been obtained, monitor in accordance with Subsection O.5. Monitor using the method specified in Section P. If an instrument reading >= 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
	•	Which Months: All Year Statistical Basis: None specified
187	[LAC 33:III.5109.A]	Pumps in light liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection D.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
188	[LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service: Calculate the percent leaking connectors using the equation in Subsection O.12 for use in determining the monitoring frequency, as specified in Subsection O.12 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
189	[LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs
		D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.  Which Months: All Year Statistical Basis: None specified
	FUG 182 183 184 185 186	FUG 0003 FUG-TS - Treatr  182 [LAC 33:III.5109.A]  184 [LAC 33:III.5109.A]  185 [LAC 33:III.5109.A]  186 [LAC 33:III.5109.A]

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### Group: PCS 0002 TS Process

#### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

	[LAC 33:III.5109.A]	Pumps in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly. Monitor to detect leaks using the
-	•	methods specified in Subsection P.2, except as provided in Subsection C.4 and Subsections D.4, D.5, and D.6, as specified in Paragraph D.1.a of
		the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If an instrument reading of 2000 ppm or greater is
		measured, a leak is detected. If a leak is detected, initiate repair provisions as specified in Subsection D.3.
. 101	[LAC 33:III.5109.A]	Which Months: All Year Statistical Basis: None specified
171	, frvc 22:111:2103:V]	Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: Repair
	•	leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in
	•	Subsection K.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
192	[LAC 33:III.5109.A]	Submit report: Due semiannually starting six months after the initial report required in Subsection R.1. Include the information specified in
	•	Paragraphs R.2.a through R.2.e, as specified in Subsection R.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March
		30, 1995).
193	[LAC 33:III.5109.A]	Open-ended valves or lines: Monitor and repair in accordance with Section I, as specified in Subsection H.4 of the Louisiana MACT
•	i	Determination for Non-HON Equipment Leaks (March 30, 1995).
194	[LAC 33:111.5109.A]	Pumps in light liquid service (dual mechanical seal system): Equipment/operational data monitored by visual inspection/determination daily, if
		pump is in service. Check sensor daily or equip with an audible alarm, as specified in Subparagraph D.4.e.i of the Louisiana MACT
•		Determination for Non-HON Equipment Leaks (March 30, 1995). If the sensor indicates failure of the seal system, the barrier fluid system, or
*		both based on the criterion determined in Paragraph D.4.e.ii, a leak is detected. If a leak is detected, initiate repair provisions specified in
		Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
105	[[ A C 22.]]] E100 A]	Which Months: All Year Statistical Basis: None specified
193	[LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (difficult-to-monitor): VOC, Total monitored by the regulation's specified method(s) at
		the regulation's specified frequency. Maintain a written plan that requires monitoring of the valve at least once per calendar year, as specified in
		Subsection I.6.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. Comply with this requirement instead of the requirements in Subsection I.1.
		Which Months: All Year Statistical Basis: None specified
196	[LAC 33:III.5109.A]	VOC, Total recordkeeping by logbook within 90 days of placing equipment back in service that had been physically removed from service,
	•	disassembled or dismantled. Maintain records as required in Subsection Q.5, as specified in Subsection C.5 of the Louisiana MACT
		Determination for Non-HON Equipment Leaks (March 30, 1995).
197	[LAC 33:III.5109.A]	Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve that seals the open end at all times except during operations
		requiring process fluid flow through the open-ended valve or line or during maintenance and repair, as specified in Subsection H.1 of the
		Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

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### Group: PCS 0002 TS Process

### FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

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19	B [LAC 33:III.5109.A]	Connectors in gas/vapor service and in light liquid service (percent of leaking connectors <= 2): VOC, Total monitored by the regulation's
	•	specified method(s) annually, as specified in Subsections O.2 and O.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks
: .	•	(March 30, 1995). Annual monitoring shall be performed per the Louisiana Fugitive Emission Program Consolidation Guidelines which states as
		once every four quarters. Monitor using the method specified in Section P. If an instrument reading >= 1000 ppm is measured, a leak is
		detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
10	9 [LAC 33:III.5109.A]	Which Months: All Year Statistical Basis: None specified
19	9 [LAC 33:111.3109.A]	Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar),
		if pump is in service, as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
•		If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in
		Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1. Which Months: All Year Statistical Basis: None specified
20	0 [LAC 33:III.5109.A]	Pressure relief device in gas/vapor service: VOC, Total monitored by the regulation's specified method(s) within 5 days (calendar) after the
20		pressure release to confirm the condition of no leakage, as indicated by an instrument reading of less than 500 ppm above background, as
		specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method
		specified in Subsection P.3.
		Which Months: All Year Statistical Basis: None specified
20	[LAC 33:III.5109.A]	Open-ended valves or lines (equipped with a second valve): Operate in a manner such that the valve on the process fluid end is closed before the
		second valve is closed, as specified in Subsection H.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
20	2 [LAC 33:III.5109.A]	Sampling connection systems (closed-purge or closed-vent system): Return the purged process fluid directly to the process line with zero
÷		VOTAP emissions to the atmosphere, or collect and recycle the purged process fluid with zero VOTAP emissions to the atmosphere, or be
		designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of Section N,
		as specified in Subsection G.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
20	3 [LAC 33:III.5109.A]	Valves in gas/vapor service and in light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating
		the monitoring personnel more than two meters above a support service, as specified in Subsection I.6.a of the Louisiana MACT Determination
	4 57 11 60 60 711 61 60 13	for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.1.
20	4 [LAC 33:III.5109.A]	Attach a weatherproof and readily visible identification, marked with the equipment identification, to leaking equipment, as specified in
20	5 FT 4 C 22-TT 5100 A1	Subsection Q.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
20	5 [LAC 33:III.5109.A]	Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, a criterion
		that indicates failure of the seal system, the barrier fluid system, or both, as specified in Subparagraph D.4.e.ii of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
20	6 [LAC 33:III.5109.A]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
20	o [mio sommoromi]	specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Non-HON
		Equipment Leaks (March 30, 1995).
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# Group: PCS 0002 TS Process

# FUG 0003 FUG-TS - Treatment Services Fugitive Emissions

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## RLP 0013 2 - Sulfuric Acid Unit No. 2

Acid mist <= 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H2SO4, the production being expressed as 100% H2SO4 Subpart H. [40 CFR 60.83(a)(1)] Which Months: All Year Statistical Basis: None specified Opacity < 10 percent. Subpart H. [40 CFR 60.83(a)(2)] Which Months: All Year Statistical Basis: None specified Use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 4	
Which Months: All Year Statistical Basis: None specified  211 [40 CFR 60.83(a)(2)] Opacity < 10 percent. Subpart H. [40 CFR 60.83(a)(2)]  Which Months: All Year Statistical Basis: None specified	
211 [40 CFR 60.83(a)(2)] Opacity < 10 percent. Subpart H. [40 CFR 60.83(a)(2)] Which Months: All Year Statistical Basis: None specified	
Which Months: All Year Statistical Basis: None specified	
Which Months: All Year Statistical Basis; None specified  212 [40 CFR 60.85(a)]  Use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 4	
212 190 CIA 00.00 July U.Se as reference methods and procedures the fest methods in 40.1 KB 60. Appendix A or other methods and procedures or specifical in 4	
by or mentions and brooking and brooking as absoluted in the	CFR
60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.856]	.)]
213 [40 CFR 60.85(b)] Determine compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and process the standards of the compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and process the compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and process the compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and process the compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and process the compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test methods and process the compliance with the SO2 and compliance with the SO2 and compliance with the solution of the compliance with the solution of the compliance with the solution of the compliance with the solution of the compliance with the solution of the compliance with the solution of the compliance with the solution of the compliance with the solution of the compliance with the solution of the compliance with the solution of the compliance with the solution of the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance with the compliance wi	cedures
specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]	
214 [40 CFR 60.Subpart H] Shall meet a 365-day rolling average limit of 2.2 lbs. of SO2 per ton of 100% sulfuric acid produced, averaged over all operating hours	n a
rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defi	ed as all
periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on January 1, 20	1 and
demonstrate compliance by January 1, 2012.)	. I and
Which months: All year Statistical Basis: 365-day rolling average.	
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except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.	
216 [40 CFR 60.Subpart H] Shall meet a limit of 3.0 lbs SO2/ton, expressed as lbs. of SO2 emissions per ton of 100% sulfuric acid produced, averaged over each ro	ling 3-
hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this requirement, startu-	and
shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas blower shutdown. Sh	tdown is
the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and fuel oil) to the furnace ce	se.
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# Group: PCS 0002 TS Process

RLP 0013 2 - Sulfuric Acid	Unit No. 2
217 [40 CFR 60.Subpart H]	Rhodia shall comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.
218 [40 CFR 60.Subpart H]	Rhodia shall comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H, Appendix B and Appendix F.
219 [LAC 33:III.501.C.6]	Rhodia shall install continuous emission monitors (CEMs) for NOx as part of the debottlenecking project. STATE ONLY.
220 [LAC 33:III.5107.A.2]	Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
RI P 0014 3 - Sulfuric Acid	Linit No. 4

KLP	0014 3 - Sulfuric Acid (	Juit No. 1
221	[40 CFR 60.83(a)(1)]	Acid mist <= 0.15 lb/ton (0.075 kg/metric ton) of acid produced, expressed as H2SO4, the production being expressed as 100% H2SO4. Subpart H. [40 CFR 60.83(a)(1)]
		Which Months: All Year Statistical Basis: None specified
222	[40 CFR 60.83(a)(2)]	Opacity < 10 percent. Subpart H. Effective starting on May 1, 2012. [40 CFR 60.83(a)(2)]
		Which Months: All Year Statistical Basis: None specified
223	[40 CFR 60.85(a)]	Effective May 1, 2012, use as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as
		specified in 40 CFR 60.85, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart H. [40 CFR 60.85(a)]
224	[40 CFR 60.85(b)]	Effective May 1, 2012, determine compliance with the SO2, acid mist, and visible emission standards in 40 CFR 60.82 and 60.83 using the test
		methods and procedures specified in 40 CFR 60.85(b) and (c), as applicable. Subpart H. [40 CFR 60.85(b)]
225	[40 CFR 60.Subpart H]	Effective May 1, 2012, Rhodia will comply with the reporting requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A,
	•	Subpart H, Appendix B and Appendix F.
226	[40 CFR 60.Subpart H]	Effective May 1, 2012, meet a 365-day rolling average limit of 1.9 lbs. of SO2 per ton of 100% sulfuric acid produced, averaged over all operating hours in a rolling 365-day period. This limit applies at all times, including periods of startup, shutdown and malfunction. Operating hours are defined as all periods when sulfur-bearing compounds, except natural gas and fuel oil, are fed to the furnace. (Commence monitoring on May 1, 2012 and demonstrate compliance by May 1, 2013.)
		Which months: All year Statistical Basis: 365-day rolling average.
227	[40 CFR 60.Subpart H]	Conduct a SO2 Performance Test by August 29, 2012, to demonstrate compliance with the 3-hour average SO2 emissions limit. Such test must consist of at least 9 runs and be conducted pursuant to 40 CFR Part 60, Appendix A, Reference Method 8 and Appendix B, Performance Specification 2. This can serve as the CEMS relative accuracy test required under Performance Specification 2, and as applicable, the required NSPS performance test under 40 CFR 60.8.
228	[40 CFR 60.Subpart H]	Effective May 1, 2012, Rhodia will comply with the monitoring requirements for SO2 set forth in 40 CFR 60 Subpart A, Subpart H, Appendix
	¢	B, and Appendix F, except where superseded by the Alternative Monitoring Plan approved by EPA and LDEQ on July 23, 2007.
229	[40 CFR 60.Subpart H]	Effective May 1, 2012, Rhodia will comply with the recordkeeping requirements for sulfuric acid plants set forth in 40 CFR Part 60, Subpart A, Subpart H and Appendix F.

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# Group: PCS 0002 TS Process

# RLP 0014 3 - Sulfuric Acid Unit No. 1

230	[40 CFR 60.Subpart H]	Effective May 1, 2012, meet a limit of 3.0 lbs SO2/ton, expressed as lbs. of SO2 emissions per ton of 100% sulfuric acid produced, averaged
		over each rolling 3-hour period. This limit does not apply during periods of Startup, Shutdown or Malfunction. For the purposes of this
		requirement, startup and shutdown are defined as follows. Startup is the 24-hour period when the sulfur-bearing feed starts after a main gas
		blower shutdown. Shutdown is the stopping of operation for any reason, beginning at the time sulfur-bearing feeds (except for natural gas and
001	T + C 22 TV +2 + C	fuel oil) to the furnace cease.
231	[LAC 33:III.1311.C]	Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60
		consecutive minutes. This requirement applies from the effective date until April 30, 2012.
	•• . • . • . •	Which Months: All Year Statistical Basis: Six-minute average
232	[LAC 33:111.1503.A.1]	Sulfur dioxide <= 2000 ppmv. This requirement applies from the effective date until April 30, 2012.
		Which Months: All Year Statistical Basis: Three-hour average
233	[LAC 33:III.1503.D.1]	Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC
	•	33:III.1503.D.Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and
		for any additional compliance determinations as requested by DEQ. This requirement applies from the effective date until April 30, 2012.
234	[LAC 33:III.1511.A]	Sulfur dioxide monitored by continuous emission monitor (CEM) continuously, except as specified in LAC 33:HI.1511.C and 1511.D. Ensure
,	•	that the measurement system is certified according to Performance Specification 2 of 40 CFR 60, Appendix B, and quality assured by the
		procedures in 40 CFR 60, Appendix F. Prior to May 1, 2012, Minimum degree of data availability shall be at least 90% (based on a monthly
		average) of the operating time. Up to 20 minutes per day for calibration will not be counted against the 90% data capture. If the analyzer is out
		for more than one hour, an alternate method is needed to ensure that concentration and lb/hr limits are met. As such, Rhodia will reduce the acid
	•	production rate to 425 ton/day or conduct Reich tests at one hour intervals. Normal waste fuel feed rates may continue. If the analyzer is out for
		>3 days in a month, the continuous monitoring requirement can be satisfied by increasing Reich testing frequency to 15 min intervals until the
	•	analyzer is back in service. If a spare analyzer is installed, a cylinder gas audit will be conducted on the spare analyzer prior to being put into
		service. RATA testing will continue using the same schedule as for the analyzer that was replaced. This requirement applies from the effective
		date until April 30, 2012. On and after May 1, 2012, Comply with Alternative Monitoring Plan per Consent Decree.
		Which Months: All Year Statistical Basis: None specified
235	[LAC 33:III.1513.A.1]	Sulfur dioxide recordkeeping by continuous emission monitor (CEM) continuously. This requirement applies from the effective date until April
	,	30, 2012,
236	[LAC 33:III.1513.A.2]	Submit compliance determination results: Due no later than 90 days after completion of test. This requirement applies from the effective date
		until April 30, 2012.
237	[LAC 33:III.1513.A.2]	Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance
	•	determination data. This requirement applies from the effective date until April 30, 2012,
238	[LAC 33:III.1513.E]	Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and
	• ,	reports of emergency conditions. This requirement applies from the effective date until April 30, 2012.
239	[LAC 33:III.1513.E]	Make all compliance data available to a representative of DEQ or the U.S. EPA on request. This requirement applies from the effective date
		until April 30, 2012.

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# Group: PCS 0002 TS Process

RLP 0014 3 - Sulfuric Ac	id Unit No. 1
240 [LAC 33:III.1513.E]	Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with
241 [LAC 33:III.501.C.6] 242 [LAC 33:III.5107.A.2]	the provisions of LAC 33:III.Chapter 15. This requirement applies from the effective date until April 30, 2012.  Rhodia shall install continuous emission monitors (CEMs) for NOx as part of the debottlenecking project. STATE ONLY.  Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
EQT 0140 10 - Preheater	; Acid Unit No. 1
243 [LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
244 [LAC 33:III.1313.C]	Which Months: All Year Statistical Basis: None specified  Total suspended particulate <= 0.6 lb/MMBTU of heat input.
245 [LAC 33:III.1513.C]	Which Months: All Year Statistical Basis: None specified Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
EQT 0141 11 - Lime Silos	<b>3</b>
246 [LAC 33:III.1311.B]	Total suspended particulate <= 32.95 lb/hr using a max hourly operating rate throughput of 22.5 tons/hr. The rate of emission shall be the total of all emission points from the source.
247 [LAC 33:III.1311.C]	Which Months: All Year Statistical Basis: None specified  Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  Which Months: All Year Statistical Basis: Six-minute average
<u> </u>	
EQT 0142 12 - Oleum Lo	ading Vent Scrubber
248 [LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device once every four hours. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.
249 [LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: None specified Scrubber Flow rate >= 50 gallons/min. Based on a four-hour block average. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable scrubber. STATE ONLY.
250 [LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis; Four-hour average  Flow rate recordkeeping by electronic or hard copy once every four hours. Applies only when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.

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#### EQT 0142 12 - Oleum Loading Vent Scrubber

251	[LAC 33:III.501.C.6]	Maximum scrubber solution strength of Sulfuric acid monitored by product sampling weekly. Applies only when venting to atmosphere. This
		requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY.  Which Months: All Year Statistical Basis: Weekly maximum
252	[LAC 33:III.501.C.6]	Maximum scrubber solution strength of Sulfuric acid recordkeeping by electronic or hard copy weekly. Applies only when venting to
		atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. STATE ONLY
253	[LAC 33:III.501.C.6]	Maximum scrubber solution strength of Sulfuric acid <= 20 percent. Maximum acid strength of 20%, based on a weekly sample. Applies only
		when venting to atmosphere. This requirement does not apply during periods of planned routine maintenance on the scrubber. During periods of
		planned routine maintenance on the scrubber, the oleum tank and loading vents will either be routed to the process or to a backup portable
		scrubber. STATE ONLY,
		Which Months: All Year Statistical Basis: Weekly maximum
254	[LAC 33:HI.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

#### EQT 0146 20 - Sulfur Feed Tank

255 [LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually.	Record and retain at the site sufficient data to
	show annual potential sulfur dioxide emissions.	

## EQT 0149 24 - Oleum Barge Loading Scrubber

256	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy once every four hours when barge vents are routed to scrubber. STATE ONLY.
257	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
258	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device once every four hours when barge vents are routed to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
259	[LAC 33:III.501.C.6]	Flow rate >= 15 gallons/min when barge vents are routed to scrubber. STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
260	[LAC 33:III.501.C.6]	Scrubber water must be replaced after every two barges loaded. STATE ONLY.

## EQT 0152 28 - Gasoline Storage Tank

261	[LAC 33:III.2103.A]	Each tank, reservoir, or container with a capacity less than 40,000 gallons but more than 250 gallons storing any VOC with a vapor pressure
262	[LAC 33:III.2103.I]	greater than 1.5 psia shall be equipped with a submerged fill pipe or a vapor loss control system.  Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

# EQT 0153 6-90 - Package Boiler

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#### EQT 0153 6-90 - Package Boiler

<u> </u>	0100 0.90 - Package Doll	ler
263	[40 CFR 60.44b(a)]	Nitrogen oxides <= 0.1 lb/MMBTU heat input (expressed as NO2), except as provided in 40 CFR 60.44b(k). The nitrogen oxide standards apply at all times, including periods of startup, shutdown, or malfunction. Subpart Db. [40 CFR 60.44b(a)] Which Months: All Year Statistical Basis: Thirty-day rolling average
264	[40 CFR 60.46b(c)]	Determine compliance with the NOx standards in 40 CFR 60.44b through performance testing under 40 CFR 60.46b(e) or (f), or under 40 CFR 60.46b(g) or (h), as applicable. Subpart Db. [40 CFR 60.46b(c)]
265	[40 CFR 60.48b(b)(1)]	Nitrogen oxides recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
266	[40 CFR 60.48b(b)(1)]	Nitrogen oxides monitored by CMS continuously. Calculate nitrogen oxides emission rates as specified in 40 CFR 60.48b(d), except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)] Which Months: All Year Statistical Basis: One-hour average
267	[40 CFR 60.48b(b)(1)]	Oxygen or Carbon dioxide recordkeeping by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
268	[40 CFR 60.48b(b)(1)]	Oxygen or Carbon dioxide monitored by CMS continuously, except as provided in 40 CFR 60.48b(g), (h), and (i). Subpart Db. [40 CFR 60.48b(b)(1)]
269	[40 CFR 60.48b(c)]	Which Months: All Year Statistical Basis: One-hour average Operate NOx continuous monitoring systems and record data during all periods of operation except for continuous monitoring system breakdowns and repairs. Record data during calibration checks, and zero and span adjustments. Subpart Db. [40 CFR 60.48b(c)]
270	[40 CFR 60.48b(e)]	Nitrogen oxides: Follow the procedures under 40 CFR 60.13 and 40 CFR 60.48b(e)(1) through (e)(3) for installation, evaluation, and operation of the NOx continuous monitoring system. Subpart Db. [40 CFR 60.48b(e)]
271	[40 CFR 60.48b(f)]	When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, obtain emission data by using standby monitoring systems, 40 CFR 60, Appendix A, Method 7, Method 7a, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days. Subpart Db. [40 CFR 60.48b(f)]
272.	[40 CFR 60.48b(g)]	Comply with the provisions of 40 CFR 60.48b(b), (c), (d), (e)(2), (e)(3), and (f), or monitor steam generating unit operating conditions and predict nitrogen oxides emission rates as specified in a plan submitted pursuant to 60.49b(c). Subpart Db. [40 CFR 60.48b(g)]
273	[40 CFR 60.49b(b)]	Submit the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in 40 CFR 60 Appendix B to DEQ. Subpart Db. [40 CFR 60.49b(b)]
274	[40 CFR 60.49b(d)]	Fuel rate recordkeeping by electronic or hard copy daily. Record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Subpart Db. [40 CFR 60.49b(d)]
275	[40 CFR 60.49b(g)]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the information listed in 40 CFR 60.49b(g)(1) through (g)(10) for each steam generating unit operating day, except as provided under 40 CFR 60.49b(p). Subpart Db. [40 CFR 60.49b(g)]
276	[40 CFR 60.49b(h)]	Submit excess emissions report: Due by the 30th day following the end of each six-month period. Report any excess emissions which occurred during the reporting period. Subpart Db. [40 CFR 60.49b(h)]
277	[40 CFR 60.49b(i)]	Submit reports containing the nitrogen dioxide emission rate information recorded under 40 CFR 60.49b(g). Subpart Db. [40 CFR 60.49b(i)]

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#### EQT 0153 6-90 - Package Boiler

278	[40 CFR 60.Subpart Db]	The permit specific requirements pertaining to NOx and O2 CEMs become effective upon installation of the NOx analyzer in 1H2010.
279	[40 CFR 60.Subpart Db]	The permit specific requirements pertaining to the 30-day performance test per 40 CFR 60.46b(e) become effective upon installation of the NOx CEMs in 1H2010.
280	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
	,	Which Months: All Year Statistical Basis: None specified
281	[LAC 33:III.1313.C]	Total suspended particulate <= 0.6 lb/MMBTU of heat input.
	•	Which Months: All Year Statistical Basis: None specified
282	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
283	[LAC 33:III.507.H.1.a]	Nitrogen oxides: When NOx emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, obtain emissions data by using a DEQ-approved monitoring plan per 40 CFR 60.49b(c) to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

#### **EQT 0186** 1-06 - Rental Boiler

284	[40 CFR 60.44b(k)]	Limit boiler operation to an annual capacity factor of 10 percent or less for natural gas. [40 CFR 60.44b(k)]
285	[40 CFR 60.49b(b)]	Submit the maximum heat input capacity data from the demonstration of the maximum heat input capacity of the affected facility to DEQ. Subpart Db. [40 CFR 60.49b(b)]
286	[40 CFR 60.49b(d)(2)]	Record and maintain records of the amount of each fuel combusted during each calendar month. [40 CFR 60.49b(d)(2)]
287	[40 CFR 60.49b(p)]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records of the calendar date, the number of hours of operation, and the hourly steam load for each steam generating unit operating day. Subpart Db. [40 CFR 60.49b(p)]
288	[40 CFR 60.49b(q)]	Submit a report to DEQ containing the annual capacity factor over the previous 12 months, the average fuel nitrogen content during the reporting period if residual oil was fired, and all other applicable information per 40 CFR 60.49b(q)(1) through (q)(3). Subpart Db. [40 CFR 60.49b(q)]
289	[40 CFR 60.49b]	Report information specified in 40 CFR 60.49b(d); (o); (p); (q) and (w). Semi-annual reporting.
290	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
		Which Months: All Year Statistical Basis: None specified
291	[LAC 33:III.1313.C]	Total suspended particulate <= 0.6 lb/MMBTU of heat input.
		Which Months: All Year Statistical Basis: None specified
292	[LAC 33:III.1513.C]	Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

#### EQT 0291 M10 - Diesel Fire-Water Pump

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## EQT 0291 M10 - Diesel Fire-Water Pump

293	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
		Which Months: All Year Statistical Basis: None specified
294	[40 CFR 63.6603(a)]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
295	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first.
		Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
		Which Months: All Year Statistical Basis: None specified
296	[40 CFR 63.6603(a)]	Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
297	[40 CFR 63.6605(a)]	Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ [40 CFR 63.6605(a)]
298	[40 CFR 63.6605(b)]	Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
299	[40 CFR 63.6625(e)]	Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written
		instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner
		consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
300	[40 CFR 63.6625(f)]	Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
301	[40 CFR 63.6640(a)]	Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ [40 CFR 63.6640(a)]
302	[40 CFR 63.6640(f)(1)ii]	Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local
		government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]
303	[40 CFR 63.6640(f)(1)iii]	Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance
		and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or
		otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum
		of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and
		transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low
		frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to
		the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the
	•	emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per
304	[40 CFR 63.6655]	year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]  Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
504	[ 10 01 10 05.0055]	specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
305	[40 CFR 63.Subpart ZZZZ]	The 40 CFR 63 Subpart ZZZZ requirements listed for this engine become effective on May 3, 2013.
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#### EQT 0291 M10 - Diesel Fire-Water Pump

306 [LAC 33:III.1101.B]

Opacity <= 20 percent, except that emissions may have an opacity in excess of 20 percent for not more than one six-minute period in any 60

consecutive minutes.

Which Months: All Year Statistical Basis: None specified

[LAC'33:III.1311.C]

Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60

consecutive minutes.

Which Months: All Year Statistical Basis: Six-minute average

#### GRP 0002 CAP-SAU - SULFURIC ACID UNITS 1 & 2

Group Members: RLP 0013 RLP 0014

308 [LAC 33:III.509.R.6.a]

Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable.

309 [LAC 33:III.509.R.6.c]

After the first unit is debottlenecked, the permittee shall monitor the Sulfuric Acid Mist emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Sulfuric Acid Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering. .

310 [LAC 33:III.509.R.6.e]

Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source: 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection). .

#### GRP 0021 CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)

Group Members: EQT 0153 EQT 0186 RLP 0013 RLP 0014

311 [LAC 33:III.509.R.6.a]

Before beginning actual construction of the project, permittee shall document and maintain a record of the following information: 1) a description of the project; 2) the emissions units whose emissions of a regulated pollutant could be affected by the project; and 3) a description of the applicability test used to determine that the project is not a major modification for any regulated pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded from the projected actual emissions (the demand growth exclusion) and an explanation for why such amount was excluded, and any netting calculations, if applicable.

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## GRP 0021 CAP-Comb - CAP - Combustion (Unit 1, Unit 2, Rental Boiler)

312	[LAC 33:III.509.R.6.c]	After the first unit is debottlenecked, the permittee shall monitor the NOx emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and the emission factor(s) established in the air permit application, except for debottlenecked units which shall use data collected from NOx CEMs
313	[LAC 33:III.509.R.6.c]	After the first unit is debottlenecked, the permittee shall monitor the PM10 emissions that are emitted by this emission source (Unit 1 + Unit 2) which could increase as a result of the project and calculate and maintain a record of the annual emissions, in TPY on a 12-month rolling average basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be estimated using actual production and an emission factor derived from biennial stack testing or other method approved by LDEQ Engineering.
314	[LAC 33:III.509.R.6.e]	Permittee shall submit a report to LDEQ within 60 days after the end of the year if annual emissions, in TPY, from the project in question exceed the baseline actual emissions by a "significant" (as defined in LAC 33:III.509.B) amount, and if such emissions differ from the preconstruction projection. This report shall contain the following: 1) the name, address, and telephone number of the major stationary source; 2) the annual emissions; and 3) any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

#### UNF 0002 UNF02 - Facility Wide

315	[40 CFR 60.]	All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
316	[40 CFR 61.145(b)(1)]	Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies.
215	[40 OPD 61 140]	Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. [40 CFR 61.145(b)(1)]
317	[40 CFR 61.148]	Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and
		friable or wet-applied and friable after drying. Subpart M.
318	[40 CFR 61,355]	Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as
		applicable. Subpart FF.
319	[40 CFR 61.356]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40
		CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two
		years from the date the information is recorded unless otherwise specified. Rhodia maintains records for five years as required by Title V.
		Subpart FF.
320	[40 CFR 61.357(d)(2)]	Submit report: Due annually, beginning on the date that equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in
		accordance with 40 CFR 61.357(d)(1). Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3) or, if the information in
		40 CFR 61.357(a)(1) through (3) is not changed in the following year, a statement to that effect. Subpart FF. [40 CFR 61.357(d)(2)]
321	[40 CFR 61.]	All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
322	[40 CFR 63.1(b)(3)]	An owner or operator of a stationary source who is in the relevant source category and who determines that the source is not subject to a relevant
		standard or other requirement established under 40 CFR 63 Subpart A must keep a record as specified in 63.10(b)(3). [40 CFR 63.1(b)(3)]
323	[40 CFR 63.1095(a)(1)iii]	Keep a record of each shipment of continuous butadiene waste streams. Subpart XX. [40 CFR 63.1095(a)(1)iii]
	[ ]	

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# UNF 0002 UNF02 - Facility Wide

324	[40 CFR 63.1095(a)(1)]	Route the continuous butadiene stream to a treatment process or wastewater treatment system used to treat benzene waste streams that complies
325	[40 CFR 63.1095(a)(1)]	with the standards specified in 40 CFR 61.348. Subpart XX. [40 CFR 63.1095(a)(1)]  Comply with the requirements of 40 CFR 61 Subpart FF, with the changes in 40 CFR 63 Subpart XX Table 2 and 40 CFR 63.1095(a)(1)(i) through (a)(1)(v). Subpart XX. [40 CFR 63.1095(a)(1)]
326	[40 CFR 63.1095(a)(1)]	Include list of continuous butadiene waste streams in annual benzene NESHAP report and note whether or not streams were controlled. 40 CFR 63.1095(a)(1)(iv) & (v). Subpart XX. [40 CFR 63.1095(a)(1)]
327	[40 CFR 63.1095(a)(3)]	Comply with the requirements of 40 CFR 63.1095 at all times except during periods of startup, shutdown, and malfunction, if the startup, shutdown, or malfunction precludes the ability of the affected source to comply with the requirements of 40 CFR 63.1095 and the provisions for periods of startup, shutdown, and malfunction, as specified in 40 CFR 63.1111, are followed. Subpart XX. [40 CFR 63.1095(a)(3)]
328	[40 CFR 63.1096(b)]	Submit to EPA a written certification that affected waste streams will be managed and treated per the applicable sections in 40 CFR 63 Subpart
	e e	XX. Not required unless/until wirtten notice is received from generator of subject stream(s). Waste streams regulated under Subpart XX are to
		be treated and managed per 40 CFR Part 61 Subpart FF, National Emission Standards for Benzene Waste Operations. Rhodia's Baton Rouge site is already in compliance with Subpart FF and will manage XX-regulated waste streams in the same manner as for FF-regulated waste streams. Specifically, the XX-regulated waste streams will be burned as fuel in Unit No. 1 or Unit No. 2. Subpart XX. [40 CFR 63.1096(b)]
329	[40 CFR 63.1256(a)(5)(ii)(A)]	Submit to EPA a written certification that affected wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.1256 (b) - (i). Not required unless/until wirtten notice is received from generator of subject stream(s). Affected wastewater streams and/or residuals will be direct burned (i.e., bypassing storage) in the Unit No. 1 or Unit No. 2 furnace. [40 CFR 63.1256(a)(5)(ii)(A)]
330	[40 CFR 63.1256(b)]	Comply with 40 CFR 63.1256(b) for each wastewater tank that receives, manages, or treats affected wastewater or its residual. Only Tanks 30D290 and 30D300 will be used for Subpart GGG regulated streams. [40 CFR 63.1256(b)]
331	[40 CFR 63.1256(d)(1)(iii)]	For containers (trucks/railcars), the cover and all openings will be maintained in a closed position at all times that affected material is in the container except when necessary to use the opening for removal, inspection, sampling, or pressure relief events related to safety considerations.  [40 CFR 63.1256(d)(1)(iii)]
332	[40 CFR 63.1256(g)(13)ii]	Discharge affected streams to a boiler burning hazardous waste for which a final permit has been issued under 40 CFR Part 270 and that complies with the requirements of 40 CFR Part 266 Subpart H. The regeneration furnaces are regulated under RCRA as industrial furnaces and
		are defined as boilers in 40 CFR 1251. Per 1256(g)(13), RCRA units are exempt from the design evaluation or performance test requirements and from the monitoring requirements in 1256(a)(2)(iii) as well as recordkeeping and reporting requirements associated with monitoring and performance tests. [40 CFR 63.1256(g)(13)ii]
333	[40 CFR 63.132(g)(2)]	Submit to EPA a written certification, signed by responsible official, that Group 1 wastewaters and/or wastewater residuals will be managed and treated per the applicable sections in 40 CFR 63.133 - 63.147. Not required unless/until written notice is received from generator of subject stream(s). [40 CFR 63.132(g)(2)]
334	[40 CFR 63.132(g)]	Rhodia will comply with the provisions for off-site treatment of Group 1 HON wastewater or wastewater residuals in accordance with 40 CFR 63.132(g) if/when applicable. Subpart G. [40 CFR 63.132(g)]
335	[40 CFR 63.147]	Maintain records as required by 40 CFR 63.147. This requirement only applies if/when notice is received from a customer that a HON Group 1 wastewtater or residual has been shipped to Rhodia. Subpart G.

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## UNF 0002 UNF02 - Facility Wide

	OCOL OTHER PROPERTY IN	
336	[40 CFR 63.152(b)]	Submit a Notification of Compliance Status (NCS) report within 150 days of the compliance date. As the treatment facility, the compliance date is the date upon which notice is first received that a HON Group 1 wastewater or wastewater residual has been recieved onsite. [40 CFR 63.152(b)]
337	[40 CFR 63.152(c)]	Submit Periodic Reports: Due semiannually no later than 60 calendar days after the end of each 6-month period, except as specified in 40 CFR 63.152(c)(5) and (c)(6). Submit the first report no later than 8 months after the date the Notification of Compliance Status is due. Include the information specified in 40 CFR 63.152(c)(2) through (c)(4). Subpart G. [40 CFR 63.152(c)]
338	[40 CFR 63.152(f)]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records as specified in 40 CFR 63.152(f)(1) through (f)(7). Subpart G. [40 CFR 63.152(f)]
339	[40 CFR 68.150]	Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
340	[40 CFR 68.155]	Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (g).
341	[40 CFR 68.160]	Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (13).
342	[40 CFR 68:165]	Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (13).
343	[40 CFR 68.180]	Provide in the RMP the emergency response information listed in 68.180(a) through (c).
344	[40 CFR 68.190(c)]	Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
345	[40 CFR 68.190]	Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
346	[40 CFR 68.200]	Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
347	[40 CFR 68.22]	Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
348	[40 CFR 68.25]	Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
349	[40 CFR 68.30]	Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
350	[40 CFR 68.33]	List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
351	[40 CFR 68.36(b)]	Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
352		Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
353	[40 CFR 68.39]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.

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## - UNF 0002 UNF02 - Facility Wide

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354	[40 CFR 68.42]	Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the
		information specified in 68.42(b)(1) through (10) for each accidental release.
355	[LAC 33:III.1103]	Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111
	•	or intensify an existing traffic hazard condition are prohibited.
356	[LAC 33:III.1109.B]	Outdoor burning of waste material or other combustible material is prohibited.
357	[LAC 33:III.1303.B]	
	[====	Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
358	[LAC 33:III.2113.A]	Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds
	•	emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
359	[LAC 33:III.219]	Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of
		these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but
		not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
360	[LAC 33:III.2901.D]	Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point
	• •	butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
361	[LAC 33:III.2901.F]	If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by
	•	contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC
		33:III.2901.G.
362	[LAC 33:III.501.C.6]	Total HAP <= 9.18 tons/yr. Total HAP emissions are capped at 9.18 TPY. Emissions of each hazardous air pollutant (TAP) listed in Table A
		shall be calculated and recorded monthly, as well as the total for each HAP over the last twelve months. These records shall be kent on site and
	•	available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 9.18 tons per year of any
		combination of such HAPs for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of
		Environmental Compliance, Enforcement Division.
	FT 1 0 22 VIII C10 C 1 C 2	Which Months: All Year Statistical Basis: Annual maximum
363	[LAC 33:III.5105.A.1]	Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III. Chapter 51. Subchapter A without first obtaining
364	IT AC 22 JIT CLOS A 21	written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
	[LAC 33:III.5105.A.2]	Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.
65	[LAC 33:III.5105.A.3]	Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would
		otherwise constitute a violation of an applicable standard.
66	[LAC 33:III.5105.A.4]	Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.
367	[LAC 33:III.5107.A.2]	Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in
	•	the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full
		name of the responsible official, title, signature, date of signature and phone number of the responsible official.

Page 32 of 35

Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

## UNF 0002 UNF02 - Facility Wide

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368	[LAC 33:III.5107.A]	Submit Annual Emissions Report: Due annually, by the 30th of April unless otherwise directed by DEQ, to the Office of Environmental Services in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
369	[LAC 33:III.5107.B.1]	Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
370	[LAC 33:III.5107.B.2]	Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923.
371	[LAC 33:III.5107.B.3]	Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931. Submit notification in the manner provided in LAC 33:I.3923.
372	[LAC 33:III.5107.B.4]	Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
373	[LAC 33:III.5107.B.5]	Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
374	[LAC 33:III.5109.C]	Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
375	[LAC 33:III.5113.A.1]	Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
376	[LAC 33:III.5113.A.2]	Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
377	[LAC 33:III.5113.B.1]	Ensure that all testing done to determine the emission of toxic air pollutants is conducted by qualified personnel.
378	<del>-</del>	Submit test results: Due in writing to the Office of Environmental Services within 60 days after completion of the test. Submit test results signed by the person responsible for the test.
379	[LAC 33:III.5113.B.1]	Submit notification of testing: Due to the Office of Environmental Services at least 30 days prior to testing.

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Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4

Air - Title V Regular Permit Minor Mod

#### UNF 0002 UNF02 - Facility Wide

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380	[LAC 33:III.5113.B.2]	Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
381	[LAC 33:III.5113.B.3]	Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of
382	[LAC 33:III.5113.B.4]	toxic air pollutants.  Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through B.4.e.
383	[LAC 33:III.5113.B.5]	Col. 10 Co. 11 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 Co. 12 C
	•	Submit certified letter: Due to the Office of Environmental Services before the close of business on the sixtieth day following the completion of the emission test. Report the determinations of the emission test.
384	[LAC 33:III.5113.B.5]	Analyze samples and determine emissions within 30 days after each emission test has been completed.
385	[LAC 33:III.5113.B.6]	Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location
386	[LAC 33:III.5113.B.7]	approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.  Submit notification: Due to the Office of Environmental Services at least 30 days before the emission test. Submit notification of emission test
		to allow DEQ the opportunity to have an observer present during the test.
387	[LAC 33:III.5113.C.1]	Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
388	[LAC 33:III.5113.C.5.d]	Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters.
389	[LAC 33:III.5113.C.5.e]	Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii.
390	[LAC 33:III.5113.C.7]	
,	· · · · · · · · · · · · · · · · · · ·	Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
391	[LAC 33:III.5151.F.1.f]	An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
392	[LAC 33:III.535]	Permittee shall comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]. [LAC 33:III.537].
393	[LAC 33:III.5611.A]	Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
394	[LAC 33:III.5611.B]	During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
395	[LAC 33:III.5901.A]	Comply with the previous in 40 CER 60 except as procification I. A.C. 22 TV 5001
	· ·	Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
396	[LAC 33:III.5907]	Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site
207	FT A C 22-TH 5011 C1	consequences of accidental releases of such substances that do occur.
39/	[LAC 33:III.5911.C]	Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.

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Al ID: 1314 - Rhodia Inc Activity Number: PER20110006 Permit Number: 0840-00033-V4 Air - Title V Regular Permit Minor Mod

## UNF 0002 UNF02 - Facility Wide

	398	[LAC 33:III.919.F]	Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April for the period January 1 to December 31 of the
			previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Services.
		,	Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-G.
-	399	[LAC 33:III.927]	Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations
		,	and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:1.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.
			appropriate follow-up reports detaining methods and procedures to be used to prevent sinitial authosphicite releases.

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# AIR, PESTICIDES, AND TOXICS 6TH FLOOR RECORDS CENTER INFILE / NEW FILE FORM

New file: or	Infiling:	X		
Choose from the file types below:			•	
Air Facility TSCA	•	• .		
AR- Acid Rain	- Asbestos Hazaı	d Emergency Res	sponse Act	
CB- Confidential Business AS	or AW - Asbesto	s or Asbestos Wo	rker Prot.	
CO- Compliance CB	- Confidential			
EN- ** Enforcement	- Site Specific			
GE- General FO	- Non Site Specifi	c		
X PE- Permit IM	- ** Section 5 * 8			
RA- Regulatory Applicability LB	- ** Lead		Proj No:	415
Other: PC	- **PCB		LDEQ AI:	1314
** Extension of File Type (if needed):  ES - Enforcement Sens  DP - Docket Number	sitive	Permit Type Minor Pmt No: PSD Pmt No: TV Pmt No: NNSR Pmt No:	Number 2184-V3	
EPCRA / SARA FIFRA	· · · · · · · · · · · · · · · · · · ·	CAIR Pmt No: AR Pmt No:		
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Site Name: CATHYVAL PLANT Area Name:				
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Fac Street: 1275 Airline Hwy Fac City:	Baton Rou	ge		
Fac Cnty: East Baton Rouge Fac State:	LA	Fac Zip:	70805	
<b>-</b>	Materials Sent		*	
Requestor's Name: Brad Toups  214 - 665 - 7258	Application:		Format: Pap	ıer

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PEGGY M. HATCH
SECRETARY

# State of Louisiana

# DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

Certified Mail No. 7005 1820 0002 2091 7499

Activity No.: PER20120002 Agency Interest No. 1314

Daniel Tate Plant Manager Rhodia, Inc. P.O. Box 828 Baton Rouge, La 70821

RE:

Part 70 Operating Permit Modification - Rhodia, Inc.- CATHYVAL Plant

Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Tate:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 25th of April, 2016, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this \_

, 2012.

Permit No.: 2184-V3

Sincerely,

1//

Sam L. Phillips Assistant Secretary

SLP: EMC

c: EPA Region VI√

RECEIVED - 6PDL AIR PLANNING SEC 12 MAY - 1 PM 2: 2:

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

#### I. Background

Rhodia Inc. operates the CATHYVAL Plant located in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility produces fine specialty organic chemicals that are used in food, fragrances, pharmaceuticals, and as laboratory reagents. The CATHYVAL Plant currently operates under Title V Permit No. 2184-V2, issued on April 25, 2011.

### II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Rhodia Inc. on March 26, 2012, requesting a Part 70 operating permit modification.

# III. Description

The CATHYVAL Plant consists of the Cathy, Daphne, and Vanessa production units, and a Wastewater Treatment Unit. Steam to operate these units is supplied by the waste heat boilers of the Sulfuric Acid Plant.

## Cathy Unit

The Cathy Unit produces pyrocatechol and hydroquinone for use as a raw material at the Daphne Unit and hydroquinone (HQ) for outside sales. Pyrocatechol and hydroquinone are synthesized using a proprietary Rhodia hydroxylation process. Phenol and hydrogen peroxide react to form pyrocatechol and hydroquinone. The reaction mixture is dissolved in a light organic solvent in the extraction section. Unreacted phenol is recovered using distillation and recycled back to the process. Waste acids and salts from the reaction are extracted in an aqueous phase and sent to waste water treatment. The tars are sent to the acid plant to be burned as fuel. Products (hydroquinone and pyrocatechol) are then separated in the splitter. Finally, pyrocatechol is transferred to storage in molten form or flaked and packaged while hydroquinone is crystallized, centrifuged, dried, and packaged. Pyrocatechol may also be mixed with a solvent and shipped as a liquid for certain customers.

### Daphne Unit

The Daphne unit synthesizes guaiacol and guetol using a proprietary Rhodia process. Production of guaiacol and guetol from pyrocatechol is similar except that the guetol process uses ethyl chloride as a reactant, whereas the guaiacol process uses methyl chloride. Veratrole and o-diethoxybenzene (ODEB) are produced as co-products for outside sales.

Guaiacol is produced by a methylation process using pyrocatechol, methyl chloride, and caustic in the presence of water and a light organic solvent. Guetol is produced by an

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ethylation process using pyrocatechol, ethyl chloride, and caustic in the presence of water and a light organic solvent. The phases are separated, and organics in the aqueous layer are then removed by solvent extraction. The residual aqueous layer is sent to the waste treatment unit. The recovered mixture of organics and solvent is distilled to recover and recycle the solvent. It is then further distilled to recover pure guaiacol/guetol and veratrole/ODEB. The pure guaiacol/guetol is sent to the Vanessa Unit, or shipped to external customers by bulk shipments or in drums. Veratrole and ODEB are purified by washing and further distillation then shipped to external customers by bulk shipments or in drums. Heavy impurities from the distillations are sent to the acid plant to be burned as fuel.

The Daphne Unit operates in series with the Cathy and Vanessa Units, and runs more efficiently. Due to this higher efficiency, Rhodia may also utilize the Daphne Unit to manufacture para-methoxy-phenol (PMP) in place of guaiacol/guetol and veratrole/ODEB.

PMP and its byproduct para-di-methoxy-benzene (PDMB) are manufactured by methylation of HQ using methyl chloride. HQ produced by the Cathy Unit, or received from external suppliers, is used as a feedstock. The separation steps are similar to the guaiacol/guetol process. No purification of PDMB is necessary. PMP is shipped in bulk as a molten liquid.

#### Vanessa Unit

The Vanessa Unit synthesizes vanillin and ethyl vanillin utilizing a proprietary Rhodia process. In vanillin production, guaiacol reacts with sodium hydroxide to form sodium guiacolate. Sodium guiacolate is then condensed with glyoxylic acid to form sodium mandelate in the condensation section. In the extraction/distillation section, the unreacted guaiacol is then extracted with solvent. The organic phase is distilled and the aqueous phase is stripped to recover the guaiacol and solvent for recycle. In the oxidation area, the aqueous mandelate solution is reacted with air and caustic in the presence of a catalyst to form vanillate. The aqueous vanillate solution is neutralized to form the product vanillin. The vanillin is then extracted with solvent. After recovery and recycling of the solvent, the vanillin is purified by washing and distillation and converted to the solid product by flaking or crystallizing and drying. Crystallized product is packaged into boxes or other containers. Flaked product is packaged in super-sacks. Ethyl vanillin is manufactured through the same series of steps by substituting guetol for guaiacol.

#### Wastewater Treatment Unit

All liquid effluents from the CATHYVAL Plant are routed to the Wastewater Treatment Unit via Tank 28 and/or Tank 29. The effluent is sent to the aeration basins where it is treated aerobically with an activated sludge process. The sludge is then separated from the liquid effluent in the clarifiers and solid-liquid separation equipment.

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The clarified effluent is then discharged to the Mississippi River. All stormwater from the CATHYVAL Plant will be discharged to the Mississippi River after it has been flushed into Tank 29 (EQT 119) to prevent potential contamination (oil, zinc, etc.) from reaching the river. The stored stormwater from Tank 29 (EQT 119) is used as dilution water and treated as normal effluent into the aerobic/activated sludge process.

#### Air Emissions Control Measures

The primary emissions from the CATHYVAL Plant process are volatile organic compounds (VOCs), some of which are HAP/TAPs, and particulate matter ( $PM_{10}$ ). There is a small amount of natural gas combustion emissions as well. The CATHYVAL plant is not a major Title V source on its own, but is subject to Title V permitting due to its co-location with the Sulfuric Acid Plant.

Any vent streams containing the chlorinated hydrocarbons methyl chloride and ethyl chloride are vented conveyed to the sulfuric acid regeneration furnaces in the acid plant (primarily Sulfuric Acid Unit No. 1, EPN 3, with Unit No. 2, EPN 2, as a backup) for combustion and HCl control. Non-chlorinated vent streams containing light organics are controlled by condensers and scrubbers. The effluent from the scrubbers is either recycled within the process or sent to the wastewater treatment unit. Some of the water sent to the wastewater treatment unit is first sent to a stripper, where organics are recovered and recycled to the process. The scrubbers are equipped with a continuous water flow meter as well as a high pressure drop alarm to ensure proper performance.

With this permit modification, Rhodia proposes the following changes:

- Increase hot water wash hours from 70 to 100 hours per year for Scrubber C-29 (EQT076) and from 16 to 100 hours per year for Scrubbers C-319 (EQT082) and Scrubber C-561 (EQT094); update the emission limits to reflect these changes.
- Delete TAP emissions for baghouses (EQT0075, EQT0110, EQT0111, EQT0112, and EQT0116). Emissions of particulate matter were incorrectly speciated into TAP compounds.
- Include of stack discharge characteristics for three engines, EQT0286, EQT0287, and EQT0288.
- Update General Condition XVII and Insignificant Activities lists.

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- Correct name of EQT0210 from "C-441 Solvent 2 Washing Column" to "C-440 Solvent 2 Washing Column."
- Update Specific Requirements list to reflect revisions made since previous permit modification.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	After	Change
$PM_{10}$	1.98	1.98	-
$SO_2$	0.16	0.16	- -
$NO_X$	6.19	6.19	-
CO	3.98	3.98	_
VOC *	27.09	27.51	+0.42

*VOC LAC 33:III Chapter 51 To		After	Change
Pollutant	Before	Allei	Change
Ethyl Chloride	0.12	0.12	<b>=</b> 1000 000 000
Hydroquinone	0.36	0.09	-0.27
Methanol	3.38	3.38	- :
Methyl Chloride	0.23	0.23	-
Methyl isobutyl ketone	9.46	9.46	-
Phenol	0.52	0.39	-0.13
Pyrocatechol	0.46	0.21	-0.25
Total HAPs	14.53	13.88	-0.65

# IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD), does not apply.

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This facility is part of a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

#### V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

#### VI. Public Notice

Public notice is not required for minor modification to a Part 70 operating permit.

#### VII. Effects on Ambient Air

Dispersion Model(s) Used:

Emissions associated with the proposed modification were reviewed by LDEQ to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions for this modification. However, in March 2005, modeling was performed. The results are shown below.

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Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or
			(National Ambient Air Quality Standard
			(NAAQS)
MIBK	8-hour	323 ug/mg	4880

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## VIII. General Condition XVII Activities

Emission Rates - tons

Emission Rates - tons													
Work Activity	PM <sub>10</sub>	SO <sub>2</sub>	NOX	co	VOC	Ot	her						
Collecting 220 process samples/day for					0.01	PC	< 0.01						
quality assurance in 4 oz bottles and assuming that a max of 1% is emitted to						HQ	< 0.01						
the atmosphere.						Phenol	< 0.01						
			·			MIBK	< 0.01						
						MeOH	< 0.01						
						EtCl	< 0.01						
						MeCl	< 0.01						
Drum Loading, unloading, and heating					0.22		-						
Phenol melting					0.02	Phenol	0.02						
Maintenance activities including:					0.25	PC	0.03						
Opening/removing pumps, compressors, instruments, valves, vents, and piping;						HQ	0.03						
Vessel/equipment/tank truck/ISO						Phenol	0.03						
container/rail car openings; Filter and						MIBK	0.03						
strainer change-outs; Miscellaneous						MeOH	0.03						
equipment cleaning; Nitrogen/steam/air clearing of equipment and lines; Waste			ļ			EtCl	0.03						
handling/re-packaging		į				MeCl	0.03						
Temporary storage of materials in tank			·		0.05	PC	0.03						
trucks or ISO containers						HQ	< 0.01						
Fugitive dust	0.05												
Tote Loading of o-Vanillin					0.07								

# IX. Insignificant Activities

ID No.:	Description	Physical/Operating Data	Citation
	Defoamer for Tars Process	55 gallon drums	LAC 33:III.501.B.5.A.2
_	Defoamer for WWTU	55 gallon drums	LAC 33:III.501.B.5.A.2
_	Polymer for WWTU – Vulcan 4864	250 gallon totes	LAC 33:III.501.B.5.A.2
D-309X	Clarifier Polymer Feed Tank	1050 gallons	LAC 33:III.501.B.5.A.3
D-407X	Filter Polymer Feed Tank	1690 gallons	LAC 33:III.501.B.5.A.3
D-317X	Polymer Makeup Tank	880 gallons	LAC 33:III.501.B.5.A.3
D-320	Clarifier Floating Layer Tank	750 gallons	LAC 33:III.501.B.5.A.3
D-323	Clarifier Underflow Tank	3170 gallons	LAC 33:III.501.B.5.A.3

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ID No.:	Description	Physical/Operating Data	Citation
D-316	Effluent Pump Tank	4300 gallons	LAC 33:III.501.B.5.A.3
D-420	Filtrate Tank	1260 gallons	LAC 33:III.501.B.5.A.3
C-104	Perchloric Acid Tank, P&ID F103	Vents to Y-132	LAC 33:III.501.B.5.A.4
D-101	H <sub>2</sub> O <sub>2</sub> Tank P&ID F102	Vents to Y-120V	LAC 33:III.501.B.5.A.4
D-102	H <sub>2</sub> O <sub>2</sub> Tank P&ID F102	Vents to Y-121V	LAC 33:III.501.B.5.A.4
D-106	Polyphosphoric Acid Tank, P&ID F103	Vents to Y-136	LAC 33:III.501.B.5.A.4
D-605	Metabisulfate Injection Tank, P&ID F601	Vents to atmosphere	LAC 33:III.501.B.5.A.4
D-664	Oxalic Acid Injection Drum	Vents to atmosphere	LAC 33:III.501.B.5.A.4
	4 Laboratory Vents	N/A	LAC 33:III.501.B.5.A.6
	Analyzer Vents	N/A	LAC 33:III.501.B.5.A.9
C-243	Sulfuric Acid Dilution Tank	958 gallons	LAC 33:III.501.B.5.D

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ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115		2149	2153	5	9	11	51	56	59*
UNF01	CATHYVAL Plant	1							1					1	1	1	1	1 1	1 1
EQT 9	101 - LIGHTS TANK FARM SCRUBBER C-165					·	. 2			-	2	2		1	•		1	1	
EQT 10						1													
EQT 11	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)				·	1													
EQT 12	D-152 - SOLVENT 2 TANK (MIBK STORAGE)					1													-
EQT 13	D-153 - SOLVENT 2 TANK (MIBK STORAGE)					1													
EQT 14	D-169 - SOLVENT 3 TANK (METHANOL STORAGE)					1	·	· ·			-								
EQT 15	102 - HEAVIES TANK FARM SCRUBBER C-187						2				2	2				,			
EQT 16	D-107 (Vanessa) - GUAIACOL STORAGE TANK	_			······	1													
EQT 17	D-111 (Vanessa) - GUETOL STORAGE TANK					1		·											
EQT 18	D-113 - 50% GLYOXYLIC ACID STORAGE TANK					1													
EQT 19	103 - CONDENSATION SCRUBBER C-201										2	2					·		
EQT 20	C-216 - GUAIACOL RECYCLE TANK					1	:												

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EQT 21	104 - SOLVENT 1 VENT SCRUBBER C-248										2	2	2133		2	11	21	30	39
EQT 22	C-236 - NEUTRALIZATION SURGE TANK					1													<u> </u>
EQT 23	C-240 - EXTRACTOR TAILS UPSET TANK					1													<b>_</b>
EQT 24	C-243 - EXTRACTOR 1 TAILS SAFETY DECANTER									1									
EQT 25	C-244 - MANDELATE SURGE TANK					1													
EQT 26	C-249 - SOLVENT 1 SURGE TANK					1													
EQT 27	C-247 - SOLVENT 1 WASHING SAFETY DECANTER									1									_
EQT 28	105 - OXIDATION SCRUBBER C- 419	-									2								
EQT 29	C-409 - MANDELATE SURGE TANK					1													
EQT 30	D-417 - OXIDATION SURGE TANK			**		1	******												
EQT 31	106 - VANILLIN EXTRACTION SCRUBBER C-427					1			-	1	2	2							
EQT 32	C-421 - SOLVENT 2 SURGE TANK					1													
EQT 33	C-430 - SOLVENT 2 DECANTER									1					_				<del></del>
EQT 34	C-432 - EXTRACTION 2 DRAIN TANK	-				1			-						+				
EQT 35	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER								-	1			· · · · · ·						<u> </u>

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EQT 36	C-441 - AQUEOUS PHASE SURGE TANK					1													
EQT 37	C-501 - SOLVENT 2 DISTILLATION SURGE TANK					1													
EQT 38	C-558 - AQUEOUS EFFLUENTS TANK					1													
EQT 39	C-575 - SOLVENT 2 RECOVERY DECANTER									1									
EQT 40	107 DISTILLATION SCRUBBER C-557										2	2							
EQT 41	C-535 - TARS SURGE TANK					1													
EQT 42	C-616 - FLAKER SURGE TANK					1													
EQT 43	C-648 - RECYCLE PRODUCT HOPPER MELTER									l									
EQT 44	C-655 - MELTER SURGE TANK					- 1													
EQT 45	108 - CRYSTALLIZATION SCRUBBER C-624					1					2	2							
	C-541 - METHANOL WASHING DRUM									1									
EQT 46	(Vents through C-801)																	<u> </u>	
EQT 47	C-801 - SOLVENT 3 RECOVERY FEED TANK					1		,								!			
EQT 48	C-603 - DISOLVER							ļ		1									<u> </u>
EQT 49	C-606 - VACUUM CRYSTALLIZER									1									
EQT 50	C-617 - CENTRIFUGE SURGE TANK					.1													

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ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107			2115		2149	2153	5	۵	11	51	56	50:
EQT 51	109 - BAGHOUSE FILTER/SCRUBBER C-704		1	2	, Mr	· ·				3113	2117	2147	2133		7	11	31	36	59
EQT 52	201 - TANK FARM SCRUBBER C- 146						2			-	2	2			_				-
EQT 53	D-111 (Daphne) - PYROCATECHOL STORAGE TANK					1													<u></u>
EQT 54	D-128 - TARS STORAGE TANK					1			<b>-</b>										<del> </del>
EQT 55	D-141 - VERATROLE STORAGE TANK					1									1			:	
EQT 56	202 - VENT SCRUBBER C-685			·					<u> </u>		2	2		$\vdash$					
EQT 57	C-201 - PC DISSOLUTION TANK											1		-	-				<u> </u>
EQT 58	C-553 - GUAIACOL DISTILLATION FEED TANK					1						1			+				
EQT 59	C-561 - RECYCLE PROCESS WATER TANK		1			1									$\dashv$				
EQT 60	C-603 - GUAIACOL DISTILLATION TANK			e .	. '						-	1							
EQT 61	C-615 - TARS RECEIVER					1								_	_				
EQT 62	C-645 - PMDB RECEIVER				•	1							· ·		_				
EQT 63	C-651 - PC RECEIVER					1					<del></del>				$\dashv$				
EQT 64	C-655 - GUAIACOL LT. ENDS RECEIVER		•			1													
EQT 65	C-660 - INTERS./VERATROLE RECEIVER					1							-		$\dashv$				
EQT 66	C-665 - SECOND RECEIVER					1	~	····						$\dashv$	-				

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EQT 67	C-670 - END OF CAMPAIGN RECEIVER					1								į					
EQT 68	C-675 - GUAIACOL RECEIVER					1												`	
EQT 69	C-701 - CRUDE VERATROLE WASH TANK											1							
EQT 70	C-705 - WATER GUAIACOLATE RECEIVER					1.													
EQT 71	C-710 - CAUSTIC WASH RECEIVER			•		1										٠			
EQT 72	C-751 - VERATROLE DISTILLATION KETTLE						Ü					1							
EQT 73	C-765 - LT. ENDS RECEIVER					1													
EQT 74	C-770 - DISTILLED VERATROLE RECEIVER					1												-	
EQT 75	203 - BAGHOUSE FOR HQ HANDLING		1	2															
EQT 76	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)										2	2							
EQT 77	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM									1									
EQT 78	C-416 - PREDEPHENOL REFLUX DRUM									1									
EQT 79	C-508 - VERTICAL TAR DILUTER		,							1									
EQT 80	C-530 - DISTILLATION DRAIN TANK									1									
EQT 81	C-532 - TAILS SURGE DRUM						-			1									

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ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	5 9	11	51	56	59*
EQT 82	302 - OSBL TANK FARM SCRUBBER C-319 (F&I,D, F107)									1	2	2						
EQT 83	C-113 - PHENOL UNLOADING TANK									1								
EQT 84	D-107 - WASHWATER TANK					1												<u> </u>
EQT 85	D-111 - PHENOL MAKE-UP TANK					1												
EQT 86	D-115 - WASHWATER/GUAIACOL TANK					1												
EQT 87	D-315 - RAFFINATE TANK									1						1		<b>†</b>
EQT 88	D-204 - RECYCLE PHENOL TANK									1								
,	303 - IPE SOLVENT VENT SCRUBBER										1	2						
EQT 89	C-402 (P&I.D. F402)			}							1	-						
EQT 90	C-320 - IPE STORAGE TANK									1		· · · · ·				1		† · · · · ·
EQT 91	C-308 - IPE SETTLER									1					1			†
EQT 92	C-311 - WASHWATER DRUM								1	1					1			<del>                                     </del>
EQT 93	C-322 - ETHER DRAIN TANK									1								+
	304 - PC FLAKER VENT SCRUBBER										2	2						
EQT 94	C-561 (P&I.D. F508)										~							
EQT 95	C-551 - PC RECEIVING DRUM									1								<b>†</b>
EQT 96	C-563 - PC FLAKER FEED TANK		-				<u> </u>			1.							1	

# **CATHYVAL Plant**

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ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113			2149	2153	5	9	11	51	56	59*
EQT 97	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)										2	2			-				
EQT 98	C-650 - REFLUX SURGE DRUM							*********		1									
EQT 99	D-607 - HQ DISSOLVER TANK	·								1									
EQT100	D-610 - HQ SURGE TANK					-				1		· · · · · · · · · · · · · · · · · · ·							<del></del>
EQT101										1									
EQT102										1									
EQT103	D-652 - MOTHER LIQUOR SURGE TANK						٠.			1									
EQT104	D-653 - CONC. COLUMN FEED TANK			·						1		·							
EQT105	D-657 - MOTHER LIQUOR SURGE DRUM		-							-1		-							
EQT106			1	2															
EQT107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)		1	2							•							-	
EQT109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)		1	2										;					
EQT110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)		1	2			7												,
EQT111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)		1	2		·	·												

### **CATHYVAL Plant**

# Agency Interest No.: 1314 Rhodia, Inc.

X.	Applicable Louisiana and	Federal	Air Qua	lity Req	uiremer	nts			<del>-</del>	······································	***	·w·	78711	<del>- 122</del>		<del></del>	en	<del></del>	<del></del>
							123	LA	C 33:II	I. Chapt	er	· · · · · · · · · · · · · · · · · · ·			×			x	
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107					2149	2153	5	0	11	51	56	50
EQT112			1	2								2119	2133			11	J.	30	59
EQT113	7(			<u> </u>	1							-			$\dashv$	1			
EQT114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)		·		1					-						1			
EQT115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625		1	2													•		
EQT116	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y- 760X (P&I.D. F703)		1	2	:		- • ·	<u>.</u>										-	
GRP014	J												1			<u>- , , , </u>	-		
EQT118	<del></del>				,						<del> </del>								
EQT119	401B - Stormwater Tank NO. 29 (P&I.D. F101)																		
EQT120	401C - TANK D-197																		_
EQT121	402A - WEST AERATION BASIN D210									4									
EQT122	402B - EAST AERATION BASIN D213 (P&I.D. F201)																		
EQT123								- 11											
EQT124	402D - EAST CLARIFIER D304 (P&I.D. F302)																		

# **CATHYVAL Plant**

# Agency Interest No.: 1314

# Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

X.	Applicable Louisiana and I	Federal .	Air Qua	lity Req	uiremei	ıts										·········			
								LA	C 33:II	I. Chapt	er							<del></del>	
ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	· · · · · · · · · · · · · · · · · · ·		2149	2153	5	9	11	51	56	59*
EQT125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)		1	2															
EQT126	M-6 - CATHYVAL SUMPS												2					,	
EQT127	C-101 - IPE SOLVENT STORAGE TANK		·			1					·								
EQT128	C-351 - RAG LAYER DIVERTING TANK			-				·				1							
EQT129	C-401 - AQUEOUS PHASE SURGE TANK					1													
EQT130	C-352 - RAG LAYER SURGE TANK		. "-			1													
EQT131	C-461 - AQUEOUS EFFLUENT TANK					1									·				
EQT132	C-521 - ORGANIC PHASE SURGE TANKC					1													
EQT133	C-132 - MeCl STORAGE TANK		·			1													
EQT134	C-136 - EtCl STORAGE TANK					1													
EQT135	C-301 - ACIDIFICATION/DECANTATION TANK											1							
EQT136	C-503 - DEETHERATION IPE DECANTER									1		·					-		
EQT137	D-681 - SCREENER RESIDUE DISSOLVER									1									
EQT139	110 - HIGH PURITY PC MIXING VESSEL	·					2			1									
EQT188	C-202 - PREMIXING REACTOR									- 1									

# **CATHYVAL Plant** Agency Interest No.: 1314 Rhodia, Inc.

X.	Applicable Louisiana and	Federal A	Air Qua	lity Req	uireme	ıts			<del> iteas.</del>	•									<del></del>
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ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	5	9	11	51	56	59*
EQT189	C-207 - VERATROLE STRIPPER									1					Ì				
EQT190	C-217 - NO. 1 CONDENSATION RTR.									1									
EQT191	C-219 - NO. 2 CONDENSATION RTR.									ı									
EQT192										. 1									
EQT193	C-223 - NO. 4 CONDENSATION RTR.									1									
EQT194	C-225 - NO. 5 CONDENSATION RTR.									1									
EQT195	C-227 - POLISHING REACTOR (RTR)									1									
EQT196								·		1									
EQT197	C-245 - SOLVENT 1 WASHING COLUMN					:				1							,		
EQT198	C-301 - GUAIACOL REVOVERY COLUMN									1									
EQT199	C-306 - GUAIACOL/TARS SEPARATOR									1									
EQT200	C-312 - SOLVENT 1 STRIPPER DECANTER									1	-								
EQT201	C-314 - SOLVENT 1 STRIPPER									1									
EQT202										1									
EQT203	C-320 - GUAIACOL DISTILLATION REFLUX DRUM									1									

# **CATHYVAL Plant** Agency Interest No.: 1314 Rhodia, Inc.

X.	Applicable Louisiana and l	Federal .	Air Qua	lity Req	uiremer	ıts							***						
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ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	2113	2115	2147	2149	2153	5	9	11	51	56	59*
EQT204	C-322X - SOLVENT 1 VACUUM PACKAGE SEPARATOR									1			1 1 2 2					30	
EQT205	H-317 - VACUUM SYSTEM									1									<del> </del>
EQT206	C-407 - OXIDATION REACTOR						- 1			1	-						<b></b> -	<u> </u>	<del> </del>
EQT207	C-416 - OXIDATION COLUMN									1	·		· · · · · · · · · · · · · · · · · · ·				<u> </u>		<del> </del>
EQT208							•			1									<del></del>
EQT209	C-435 - VANILLIN EXTRACTION COLUMN TANK									1							<u>.</u>		
EQT210	C-440 - SOLVENT 2 WASHING COLUMN									1									
EQT211	C-504 - VANILLIN/ SOLVENT 2 ATM. DISTILLATION COLUMN							<del>, "</del>		1									
EQT212	C-507 - VANILLIN/ SOLVENT 2 VACUUM DISTILLATION COLUMN			·						1									
EQT213	C-516 - SOLVENT 2 COLD TRAP			•						1					1				<del> </del>
EQT214	C-533X - SOLVENT 2 VACUUM PACKAGE SEPARATOR									1									
EQT215	C-565 - SOLVENT 2 RECOVERY COLUMN									1									
EQT216	C-568 - SOLVENT 2 RECOVERY COLUMN								-	1									
EQT217	E-428 - CONDENSER					******		****		1					$\neg$				
EQT218	H-520 - VACUUM SYSTEM		-:	******						1					$\dashv$				<del></del>
EQT219	C-525 - TARS REMOVAL COLUMN									1					$\dashv$				
EQT220	C-529 - TARS BY-PASS									1	· · · · · · · · · · · · · · · · · · ·				$\dashv$	$\neg$			

# **CATHYVAL Plant**

# Agency Interest No.: 1314 Rhodia, Inc.

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ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107		2113			2149	2153	5	Q	11	51	56	59
EQT221	C-545 - LIGHTS REMOVAL COLUMN						<u> </u>			1		2117	2133			11	<u> </u>	30	1 39
EQT222	C-555A/B - VANILLIN COLD TRAPS									1									
EQT223	C-562 - VANILLIN PURIFICATION VACUUM PACKAGE SEPARATOR									1									
EQT224	H-556 - VACUUM SYSTEM									1									
EQT225	C-634X - DRYER SCRUBBER				<u> </u>		· .			1	·								├—
EQT226	C-637X - CRYSTALLIZATION VACUUM SEPARATOR									1									_
EQT227	C-640 - DRYER									1 :									<del> </del>
EQT228	C-805 - SOLVENT 3 RECOVERY COLUMN	*****								1				$\dashv$				-	
EQT229	H-619 - VACUUM SYSTEM		-		***	-				1		<del></del>		$\rightarrow$			-,		
EQT230	Y-620 - CENTRIFUGE A		·							1									<del> </del>
EQT231	Y-621 - CENTRIFUGE B									1									_
EQT232	Y-640 - DRYER									1		- <u></u> -		$\dashv$					<del> </del> —
EQT233	C-606 - GUAIACOL DISTILLATION COLUMN									1		1							
EQT234	C-633X - GUAIACOL VACUUM PACKAGE SEPARATOR											1							
EQT235	C-678A/B - GUAIACOL DISTILLATION COLD TRAPS											1		$\dashv$					
EQT236	C-754 - VERATROLE DISTILLATION COLUMN											1							

# **CATHYVAL Plant**

# Agency Interest No.: 1314

### Rhodia, Inc.

X.	Applicable Louisiana and I	Federal A	Air Qua	lity Req	uiremei	ıts		······································				<del></del>				<del></del>			
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ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107	2111	-	2115		2149	2153	5	9	11	51	56	59*
EQT237	C-783X - VERATROLE VACUUM SEPARATOR									:		1						30	
EQT238	C-787 - VERATROLE DISTILLATION COLD TRAPS	·				·						1							
EQT239	C-213 - FIRST RTR				- "						1			<u> </u>					
EQT240	C-215 - SECOND RTR								7		1								<del>                                     </del>
EQT241	C-217 - THIRD RTR										1								<del>                                     </del>
EQT242	C-219 - FOURTH RTR						-		~		I								
EQT243	C-231 - FIFTH RTR							7.00	-		1							-	<del> </del>
EQT244	C-501 - DETARRING COLUMN										1	,				·			<del>                                     </del>
EQT245	C-521 - FINAL DEPHENOLING COLUMN										1					<del></del>			
EQT246	E-418 - PHENOL CONDENSER				<del></del>						1								
EQT247	H-524 - VACUUM SYSTEM					,					1								
EQT248	C-301 - WATER STRIPPER										1							-	
EQT249	C-313 - EXTRACTION COLUMN										1							-	
EQT250	C-405 - DEHYDRATION COLUMN					**					1								
EQT251	E-401 - SOLVENT VENT CONDENSER										1								
EQT252	C-536 - SPLITTER COLUMN (PC/HQ SEP)						·				1						-		
EQT253	H-545 - VACUUM SYSTEM										1								
EQT254	S-560 - PC FLAKER				,			-		1			-:-						
EQT255	C-251 - BATCH RTR											1							·

#### **CATHYVAL Plant** Agency Interest No.: 1314 Rhodia, Inc.

X.	Applicable Louisiana and I	Federal .	Air Qua	lity Req	uiremer	ıts					7 NETWO.	-		•.		<del></del>			<del>1021-1-1</del>
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ID No.:	Description	1303.B	1311.B	1311.C	1313.C	2103	2107					2149	2153	5	9	11	51	56	59*
EQT256	H-640 - VACUUM SYSTEM FOR CRYSTALLIZERS		3							1						,			
EQT257	C-451 - EXTRACTION COLUMN									1		l'''							
EQT258	C-501 - DEETHERATION COLMN									1									
EQT259	C-511 - DEETHERATION QUAIACOL DECANTER			,						1									
EQT260	C-551 - CRUDE GUAIACOL DEHYDRATION COLUMN									1									
EQT261	C-555 - WET GUAIACOL TANK					1			T										
EQT286	Fire-Water Pump G972A			1												1			
EQT287	Fire-Water Pump G972B			1	-											1			
EQT288	M-9 Emergency Diesel Generator for Daphne/Vanessa Sump			1												1			
EQT289	E-318 Predephenoling Vent Condenser			.,,,,,,						1									
EQT290	E-506 Detarring Condenser										1								
GRP022	Fire Pump Diesel Engines			1											一	1			
FUG1	F-6V <sup>-</sup> - VANESSA FUGITIVE EMISSIONS							1											
FUG4	F-6C - CATHY FUGITIVE EMISSIONS							1											
FUG5	F-6D - DAPHNE FUGITIVE EMISSIONS							1											

<sup>\*</sup> The regulations indicated above are State Only regulations.

All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

#### **CATHYVAL Plant**

Agency Interest No.: 1314

#### Rhodia, Inc.

#### Baton Rouge, East Baton Rouge Parish, Louisiana

#### KEY TO MATRIX

1 -The regulations have applicable requirements that apply to this particular emission source.

-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled

but may have monitoring, recordkeeping, or reporting requirements.

2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this

particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

<b>X.</b> A	Applicable Louisiana and	Fed	eral A	Air Qı	uality	Requi	remen	its	1			··								-	
						40 (	CFR 60					40 C	FR 6	1		40 CFR	63		40 (	CFR	
ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	$\frac{1}{A}$	М	v	FF	A	FFFF	ZZZZ	64	68	70	82
UNF01	CATHYVAL Plant	2		T			2	2	2	2	2	2	<del>L'</del>	2	2	2	1		1	70	02
EQT 9	101 - LIGHTS TANK FARM SCRUBBER C-165														2	2	1	2	1	1	1
EQT 10	D-148 - VANILLIN SOLVENT 1 TANK (METHANOL STORAGE)								-					-							
EQT 11	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)					- 1					<del> </del>										
EQT 12	D-152 - SOLVENT 2 TANK (MIBK STORAGE)		-																		
EQT 13	D-153 - SOLVENT 2 TANK (MIBK STORAGE)										<del> </del>										
EQT 14	D-169 - SOLVENT 3																				

# **CATHYVAL Plant** Agency Interest No.: 1314 Rhodia, Inc.

X.	Applicable Louisiana and	Fede	eral A	Air Qu	ality	Requi	remen	ts					:		***************************************						
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ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	TANK (METHANOL STORAGE)					-				-										.	
EQT 15	FARM SCRUBBER C-187																				
EQT 16	TANK				2			·													
EQT 17	D-111 (Vanessa) - GUETOL STORAGE TANK				2																
EQT 18	D-113 - 50% GLYOXYLIC ACID STORAGE TANK				2																
EQT 19	103 - CONDENSATION SCRUBBER C-201							٠													
EQT 20	C-216 - GUAIACOL RECYCLE TANK																				
EQT 21	104 - SOLVENT 1 VENT SCRUBBER C-248																				
EQT 22	C-236 - NEUTRALIZATION SURGE TANK																				
EQT 23	C-240 - EXTRACTOR TAILS UPSET TANK				1																
EQT 24	C-242 - EXTRACTOR 1 TAILS SAFETY DECANTER																				
EQT 25	C-244 - MANDELATE SURGE TANK																				
EQT 26	C-249 - SOLVENT 1 SURGE TANK							-													

# **CATHYVAL Plant**

# Agency Interest No.: 1314 Rhodia, Inc.

<b>X.</b>	Applicable Louisiana and	l Fed	eral A	Air Qu	ıality	Requi	remer	its													
	3.4					40 (	CFR 60			*		40 C	FR (	51		40 CFR	63		40 (	CFR	
ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	М	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT 27	C-247 - SOLVENT 1 WASHING SAFETY DECANTER																	01		10	02
EQT 28	105 - OXIDATION SCRUBBER C-419									,	-										
EQT 29	C-409 - MANDELATE SURGE TANK																				
EQT 30	C-417 - OXIDATION SURGE TANK				2																
EQT 31	106 - VANILLIN EXTRACTION SCRUBBER C-427					·															
EQT 32	C-421 - SOLVENT 2 SURGE TANK C-421					-4.															
EQT 33	C-430 - SOLVENT 2 DECANTER																				
EQT 34	C-432 - EXTRACTION 2 DRAIN TANK																			-	
EQT 35	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER				·				1-1-			1									
EQT 36	C-441 - AQUEOUS PHASE SURGE TANK																				
EQT 37	C-501 - SOLVENT 2 DISTILLATION SURGE TANK																				
EQT 38	C-558 - AQUEOUS EFFLUENTS TANK C							:				·								·	
EQT 39	C-575 - SOLVENT 2 RECOVERY DECANTER																				

### CATHYVAL Plant Agency Interest No.: 1314 Rhodia, Inc.

<b>X.</b> A	Applicable Louisiana and	Fede	eral A	Air Qu	ıality ]	Requi	remen	its	•								***********				
						40 (	FR 60		· · ·			40 C	FR 6	1		40 CFR	63		40 C	FR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT 40	107 DISTILLATION SCRUBBER C-557																				
EQT 41	C-535 - TARS SURGE TANK											*******				, , , , ,					
EQT 42	C-616 - FLAKER SURGE TANK							٠.													
EQT 43	C-648 - RECYCLE PRODUCT HOPPER MELTER																				
EQT 44	C-655 - MELTER SURGE TANK																				
EQT 45	108 - CRYSTALLIZATION SCRUBBER	-																	·		
EQT 46	C-541 - METHANOL WASHING DRUM C-541 (Vents through C- 801)																				
EQT 47	C-801 - SOLVENT 3 RECOVERY FEED TANK																				
EQT 48	C-603 - DISOLVER																			<del></del>	
EQT 49	C-606 - VACUUM CRYSTALLIZER																				
EQT 50	C-617 - CENTRIFUGE SURGE TANK																			<del></del>	
EQT 51	109 - BAGHOUSE FILTER/SCRUBBER C- 704																				
EQT 52	201 - TANK FARM																				

### CATHYVAL Plant Agency Interest No.: 1314 Rhodia, Inc.

<b>X.</b> A	Applicable Louisiana and	Fed	eral A	Air Qı	uality	Requi	remen	ıts		<u>-</u>	· · · · · · · · · · · · · · · · · · ·			,					. ***		
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ID No,:	Description	Α	K	Ka	Кb	VV	III	NNN	RRR	YYY	A	М	V	FF	A	FFFF	ZZZZ	64	68	70	82
	SCRUBBER C-146							-		· · · · · · · · · · · · · · · · · · ·	-	<del>                                     </del>			<del> </del>		3000		- 00	-	02
EQT 53	D-111 (Daphne) - PYROCATECHOL STORAGE TANK				2																
EQT 54	D-128 - TARS STORAGE TANK									· · ·						.					
EQT 55	D-141 - VERATROLE STORAGE TANK																				
EQT 56	202 - VENT SCRUBBER C-685																				
EQT 57	C-201 - PC DISSOLUTION TANK C-201												-								
EQT 58	C-553 - GUAIACOL DISTILLATION FEED TANK																				
EQT 59	C-561 - RECYCLE PROCESS WATER TANK							<del></del>													
EQT 60	C-603 - GUAIACOL DISTILLATION TANK					<u> </u>	-														
EQT 61	C-615 - TARS RECEIVER										1									<u> </u>	
EQT 62	C-645 - PMDB RECEIVER																				
EQT 63	C-651 - PC RECEIVER			<del></del>						<del></del>		-			<del> </del>						
EQT 64	C-655 - GUAIACOL LT. ENDS RECEIVER							<del></del>							,						
EQT 65	C-660 - INTERS./VERATROLE RECEIVER									-											·
EQT 66	C-665 - SECOND										1										

# **CATHYVAL Plant**

# Agency Interest No.: 1314 Rhodia, Inc.

Х.	Applicable Louisiana and	l Fed	eral .	Air Qı	ıality	Requi	remen	its	/	· · · · · · · · · · · · · · · · · · ·		·			<u> </u>	· .	<u></u>	· · · · · · · · · · · · · · · · · · ·			**************************************
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ID No.:		A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	М	v	FF	Á	FFFF	ZZZZ	64	68	70	82
	RECEIVER										<del> </del>		1		+			-	-	70	- 52
EQT 67	CAMPAIGN RECEIVER																				
EQT 68	C-675 - GUAIACOL RECEIVER				-			***			<u> </u>									<del>-</del>	
EQT 69	C-701 - CRUDE VERATROLE WASH TANK																				
EQT 70	C-705 - WATER GUAIACOLATE RECEIVER																		,,		
EQT 71	RECEIVER												ļ				-2				
EQT 72	C-751 - VERATROLE DISTILLATION KETTLE						-	17400										:			
EQT 73	C-765 - LT. ENDS RECEIVER							44			<del>                                     </del>										
EQT 74	C-770 - DISTILLED VERATROLE RECEIVER							**													
EQT 75	HQHANDLING															<u>.                                    </u>					<u> </u>
EQT 76	(F&I.D. F201)							-													
EQT 77	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223															·					
EQT 78	C-416 - PREDEPHENOL REFLUX DRUM											<u> </u>									

# **CATHYVAL Plant**

# Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

X. /	Applicable Louisiana and	Fede	eral A	Air Qı	ıality	Requi	remer	its				·····									<del></del> -
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ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT 79	C-508 - VERTICAL TAR DILUTER			-															30	70	02
EQT 80	C-530 - DISTILLATION DRAN TANK													·							
EQT 81	C-532 - TAILS SURGE DRUM C-									- **											
EQT 82	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)																				
EQT 83	C-113 - PHENOL UNLOADING TANK									. , , , , , ,											
EQT 84	D-107 - WASHWATER TANK				2																<u> </u>
EQT 85	D-111 - PHENOL MAKE- UP TANK				2															<b></b>	
EQT 86	D-115 - WASHWATER/GUAIAC OL TANK				2															· · · · · · · · · · · · · · · · · · ·	
EQT 87	D-315 - RAFFINATE TANK									<del></del>					-						
EQT 88	D-204 - RECYCLE PHENOL TANK													···							
EQT 89	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)							,		.·											
EQT 90	C-320 - IPE STORAGE TANK							·		·											
EQT 91	C-308 - IPE SETTLER				<u> </u>					*	<u> </u>										
EQT 92	C-311 - WASHWATER					-			-												

### CATHYVAL Plant Agency Interest No.: 1314

# Rhodia, Inc.

<b>X.</b> A	Applicable Louisiana and	Fed	eral 2	Air Qı	ıality 1	Requi	remer	ıts		- Wilm						, <u></u>					
YT 3.7				<del>,,</del>	<del></del>	40 (	CFR 60					40 C	FR 6	1		40 CFR	. 63		40 (	CFR	
ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT 93	DRUM C-322 - ETHER DRAIN TANK																				
EQT 94	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)																				-
EQT 95	C-551 - PC RECEIVING DRUM																				
EQT 96	C-563 - PC FLAKER FEED TANK								-												<u> </u>
EQT 97	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)													***							
EQT 98	C-650 - REFLUX SURGE DRUM																				
EQT 99	D-607 - HQ DISSOLVER TANK																				
EQT100	D-610 - HQ SURGE TANK					<u> </u>								<del></del>	<del> </del>				-		<del></del> -
EQT101	D-612 - CARBON TREATER TANK								-	·											
EQT102	D-632 - CRYSTALLIZATION TANK			÷ .										•							
EQT103	D-652 - MOTHER LIQUOR SURGE TANK		-	-					<del></del>		<u></u>									-	<del></del>
EQT104	D-653 - CONC. COLUMN FEED TANK	**						<del></del>													
EQT105	D-657 - MOTHER LIQUOR SURGE DRUM						-,			<del>-</del>	-										

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia, Inc.

<b>X.</b> A	Applicable Louisiana and	Fed	eral A	Air Qu	ıality ]	Requi	remen	ts	···	· · · · · · · · · · · · · · · · · · ·											
				· · · · · · · · · · · · · · · · · · ·		40 C	FR 60					40 C	FR 6	51 <sup>-</sup>	Ī	40 CFR	63		40 (	CFR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	М	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601																				
EQT107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)																				
EQT109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)																				
EQT110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)																				
EQT111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)																				
EQT112	313 - HQ REWORK DUMPER BAGHOUSE S- 693 FOR D607 (P&I.D. F602)																				
EQT113	315A - FLUID HEATER F- 962 (BACK-UP) (P&I.D. F927)							·													
EQT114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)																				

# **CATHYVAL Plant**

# Agency Interest No.: 1314

# Rhodia, Inc.

<b>X.</b> A	Applicable Louisiana and	Fed	eral A	Air Qu	ıality ]	Requi	remen	ts				·	<del></del>			<del>`````</del>			······································	<u>.</u>	
						40 (	CFR 60				T	40 C	FR 6	51	T	40 CFR	63		40 (	FR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	М	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625					**	-											01	00		62
EQT116	317 - VACUUM CLEAN- UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)																				
GRP014	EMISSIONS CAP – WW TREATMENT PLANT														<u> </u>						
EQT118	401A - WWT TANK NO. 28 (P&I.D. F101)												<u> </u>			****					
EQT119	401B - Stormwater Tank No. 29 (P&I.D. F101)										-					-					
EQT120	401C - TANK D-197									-	+-		<del>                                     </del>								<del></del>
EQT121	402A - WEST AERATION BASIN D210														<del> </del>						
EQT122	402B - EAST AERATION BASIN D213 (P&I.D. F201)							- <del>-</del>													
EQT123	402C - WEST CLARIFIER D301 (P&I.D. F302)						-				-									-	
EQT124	402D - EAST CLARIFIER D304 (P&I.D. F302)							7			<del> </del>							,			
EQT125	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)													<u>                                     </u>							
EQT126	M-6 - CATHYVAL SUMPS							-									""				

#### **CATHYVAL Plant**

# Agency Interest No.: 1314

# Rhodia, Inc.

X. A	Applicable Louisiana and	Fed	eral A	Air Qu	ıality	Requi	remen	its					<del></del>		·		<del></del>		. <u> </u>		
				· · · · · · · · · · · · · · · · · · ·		40 (	CFR 60					40 C	FR 6	 51		40 CFR	63	1	40 (	CFR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	Α	M	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT127	C-101 - IPE SOLVENT STORAGE TANK							V 178 &V													02
EQT128	C-351 - RAG LAYER DIVERTING TANK																				
EQT129	C-401 - AQUEOUS PHASE SURGE TANK																				
EQT130	C-352 - RAG LAYER SURGE TANK																				
EQT131	C-461 - AQUEOUS EFFLUENT TANK												-								
EQT132	C-521 - ORGANIC PHASE SURGE TANKC																				
EQT133	C-132 - MeCI STORAGE TANK																-				
EQT134	C-136 - EtCl STORAGE TANK																				
EQT135	C-301 - ACIDIFICATION/DECAN TATION TANK								·											<del></del>	
EQT136	C-503 - DEETHERATION IPE DECANTER									L											
EQT137	D-681 - SCREENER RESIDUE DISSOLVER		-							, , ,									·	·	
EQT139	110 - HIGH PURITY PC MIXING VESSEL										·										
EQT188	C-202 - PREMIXING REACTOR		·						:												
EQT189	C-207 - VERATROLE STRIPPER					÷			-141.11											•	
EQT190	C-217 - NO. 1								·						<u> </u>	ļ					<b>—</b>

# **CATHYVAL Plant** Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

<b>X.</b> A	Applicable Louisiana and	Fede	eral A	Air Qu	ality	Requi	remen	ts		**************************************	******	<del>200-1</del>									
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ID No.:	Description	A	K	Ka	Kb	VV	III	NNN	RRR	YYY	A	M	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	CONDENSATION RTR.											<del></del>			<del> </del>			-			-
EQT191	C-219 - NO. 2 CONDENSATION RTR.																				
EQT192	C-221 - NO. 3 CONDENSATION RTR.																				
EQT193	C-223 - NO. 4 CONDENSATION RTR.																				
EQT194	C-225 - NO. 5 CONDENSATION RTR.										<del> </del>			<del> </del>							
EQT195	C-227 - POLISHING REACTOR (RTR)																				
EQT196	C-241 - GUAIACOL EXTRACTION COLUMN					- m.s-									<del>                                     </del>						
EQT197	C-245 - SOLVENT 1 WASHING COLUMN			•		•															
EQT198	C-301 - GUAIACOL REVOVERY COLUMN																				
EQT199	C-306 - GUAIACOL/TARS SEPARATOR																·				
EQT200	C-312 - SOLVENT 1 STRIPPER DECANTER																				
EQT201	C-314 - SOLVENT 1 STRIPPER																			1	
EQT202	C-316 - SOLVENT 1 COLD TRAP TANK																				
EQT203	C-320 - GUAIACOL DISTILLATION REFLUX DRUM			·																	
EQT204	C-322X - SOLVENT 1 VACUUM PACKAGE							·													

### **CATHYVAL Plant**

# Agency Interest No.: 1314

# Rhodia, Inc.

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ID No.:	Description	A	K	Ka	Kb	VV	Ш	NNN	RRR	YYY	A	М	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	SEPARATOR						T														
EQT205	H-317 - VACUUM SYSTEM																				
EQT206	C-407 - OXIDATION REACTOR			-	7																
EQT207	C-416 - OXIDATION COLUMN																		:		
EQT208	C-429 - CO2 SEPARATOR	1									<del>                                     </del>				<del>                                     </del>		· · · ·				
EQT209	C-435 - VANILLIN EXTRACTION COLUMN TANK																				
EQT210	C-440 - SOLVENT 2 WASHING COLUMN																				
EQT211	C-504 - VANILLIN/ SOLVENT 2 ATM. DISTILLATION COLUMN											-									
EQT212	C-507 - VANILLIN/ SOLVENT 2 VACUUM DISTILLATION COLUMN		-											<del></del>				-			
EQT213	C-516 - SOLVENT 2 COLD TRAP			:																	-
EQT214	C-533X - SOLVENT 2 VACUUM PACKAGE SEPARATOR									<u> </u>				·							
EQT215	C-565 - SOLVENT 2 RECOVERY COLUMN																			<del></del>	
EQT216	C-568 - SOLVENT 2 RECOVERY COLUMN	-																			

# **CATHYVAL Plant** Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

<b>X.</b> A	Applicable Louisiana and	Fed	eral A	Air Qı	ality	Requi	remen	its		·	<del></del>			, , , , , , , , , , , , , , , , , , ,				·			
						40 (	CFR 60					40 C	FR 6	1	]	40 CFR	. 63		40 (	CFR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	Α	М	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT217	E-428 - DONDENSER							77			<del> </del>	<u> </u>			<del> </del>				-		-02
EQT218	H-520 - VACUUM SYSTEM																·			<del>.</del>	
EQT219	C-525 - TARS REMOVAL COLUMN																				
EQT220	C-529 - TARS BY-PASS					-		~			<b>-</b>										<del></del>
EQT221	C-545 - LIGHTS REMOVAL COLUMN							. ***						•							
EQT222	C-555A/B - VANILLIN COLD TRAPS													<b>.</b>							
	C-562 - VANILLIN						<del></del>								1						<del> </del>
EQT223	PURIFICATION VACUUM PACKAGE												:								
	SEPARATOR																				
EQT224	H-556 - VACUUM SYSTEM		:																		
EQT225	C-634X - DRYER SCRUBBER							•													
EQT226	C-637X - CRYSTALLIZATION VACUUM SEPARATOR																				
EQT227	C-640 - DRYER							• • • •	1				-		<del> </del>						
EQT228	C-805 - SOLVENT 3 RECOVERY COLUMN			•						W-5/											
EQT229	H-619 - VACUUM SYSTEM										1										
EQT230	Y-620 - CENTRIFUGE A										-		<u> </u>		<del> </del>	+		-			_
EQT231	Y-621 - CENTRIFUGE B	1											<del> </del>		-			<del> </del>	-		<del> </del>
EQT232	Y-640 - DRYER				-			<del></del>	-						<del> </del>	-			<del> </del>		
EQT233	C-606 - GUAIACOL	<b></b>					1				1				<del>                                     </del>						

### **CATHYVAL Plant**

# Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

<b>X.</b> A	Applicable Louisiana and	ı ı cu	ci ai i	JII QI	aanty						·, · · · · · ·										
						40 (	CFR 60	ı		:		40 C	FR 6	51		40 CFR	. 63	1	40 (	CFR	
ID No.:	Description	A	K	Ka	Kb	VV	Ш	NNN	RRR	YYY	A	М	V	FF	Α	FFFF	ZZZZ	64	68	70	82
	DISTILLATION COLUMN																				
EQT234	C-633X - GUAIACOL VAUUM PACKAGE SEPARATOR	-																			
EQT235	C-678A/B - GUAIACOL DISTILLATION COLD TRAPS																				
EQT236	C-754 - VERATROLE DISTILLATION COLUMN																				
EQT237	C-783X - VERATROLE VACUUM SEPARATOR																				
EQT238	C-787 - VERATROLE DISTILLATION COLD TRAPS			,			-														
EQT239	C-213 - FIRST RTR									· · · · · · · · · · · · · · · · · · ·	1					<del> </del>					<b></b>
EQT240	C-215 - SECOND RTR												1				·				
EQT241	C-217 - THIRD RTR																				
EQT242	C-219 - FOURTH RTR	<b>.</b>																			
EQT243	C-231 - FIFTH RTR	,									<u> </u>						ļ				
EQT244	C-501 - DETARRING COLUMN																				
EQT245	C-521 - FINAL DEPHENOLING COLUMN																				
EQT246	E-418 - PHENOL CONDENSER								i												
EQT247	H-524 - VACUUM SYSTEM			•																	

### CATHYVAL Plant Agency Interest No.: 1314 Rhodia, Inc.

<b>X.</b> A	Applicable Louisiana and	Fede	eral A	Air Qu	ıality	Requi	remer	its							<u> </u>	727000000					
						40 (	CFR 60	alatinos				40 C	FR 6	1		40 CFR	63		40 (	CFR	
ID No.:	Description	Α	K	Ka	Kb	VV	III	NNN	RRR	YYY	Α	М	V	FF	Α	FFFF	ZZZZ	64	68	70	82
EQT248	C-301 - WATER STRIPPER	·																			
EQT249	C-313 - EXTRACTION COLUMN																				
EQT250	C-405 - DEHYDRATION COLUMN																				
EQT251	E-401 - SOLVENT VENT CONDENSER																				
EQT252	C-536 - SPLITTER COLUMN (PC/HQ SEP)																				
EQT253	H-545 - VACUUM SYSTEM																				
EQT254	S-560 - PC FLAKER											1									
EQT255	C-251 - BATCH RTR																			Ė	
EQT256	H-640 - VACUUM SYSTEM FOR CRYSTALLIZERS																				
EQT257	C-451 - EXTRACTION COLUMN											****									
EQT258	C-501 - DEETHERATION COLMN														14.2.						
EQT259	C-511 - DEETHERATION QUAIACOL DECANTER																				
EQT260	C-551 - CRUDE GUAIACOL DEHYDRATION COLUMN																				
EQT261	C-555 - WET GUAIACOL TANK																				
EQT286	Fire-Water Pump G972A																1		1		

#### **CATHYVAL Plant**

#### Agency Interest No.: 1314

#### Rhodia, Inc.

#### Baton Rouge, East Baton Rouge Parish, Louisiana

						40 (	CFR 60					40 C	FR 6	1		40 CFR	63		40 C	CFR	
ID No.:	Description	A	K	Ka	Кb	VV	Ш	NNN	RRR	YYY	A	М	V	FF	A	FFFF	ZZZZ	64	68	70	82
EQT287	Fire-Water Pump G972B		- "		T		~	*******									1				<del>  52</del>
EQT288	M-9 Emergency Diesel Generator for Daphne/Vanessa Sump								-					-			1				
EQT289	E-318 Predephenoling Vent Condenser																			<del></del>	
EQT290	E-506 Detarring Condenser																				
GRP022	Fire Pump Diesel Engines																1				<del></del>
FUGI	F-6V - VANESSA FUGITIVE EMISSIONS					2															
FUG4	F-6C - CATHY FUGITIVE EMISSIONS					1														# -	
FUG5	F-6D - DAPHNE FUGITIVE EMISSIONS					2		<del>.</del>	<del> </del>							-					

#### KEY TO MATRIX

- The regulations have applicable requirements that apply to this particular emission source.
  - -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia, Inc.

ID No.	Requirement Requirement	Notes
JNF001 acility	NESHAP Part 60 Subpart A - General Provision	DOES NOT APPLY. No Part 60 standards apply in the CathyVal Plant.
racinty	NSPS Part 60 Subpart III - Standards of Performance for VOC Emissions From the SOCMI Air Oxidation Unit Processes	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart NNN - Standards of Performance for VOC Emissions from SOCMI Distillation Operations.	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart RRR - Standards of Performance for VOC Emissions from SOCMI Reactor Processes	DOES NOT APPLY. The CathyVal Plant does not produce any of the chemicals listed in 40 CFR 60.617 as products, co-products, by-products, or intermediates.
	NSPS Part 60 Subpart YYY - Volatile Organic Compound Emissions from the SOCMI Wastewater (Proposed)	DOES NOT APPLY. The Cathy, Daphne, and Vanessa units do not produce SOCMI chemicals as primary products. Therefore, they are not affected facilities under NSPS YYY. Hydroquinone is not the primary product of the unit.
	NESHAP Part 61 Subpart A - General Provisions	DOES NOT APPLY. No Part 61 standards apply in the CathyVal Plant.
	NESHAP Part 61 Subpart M - National Emission Standard for Asbestos	DOES NOT APPLY. The CathyVal Plant does not contain any asbestos.
	NESHAP Part 61 Subpart FF - National Emission Standard for Benzene Waste Operations	DOES NOT APPLY. The CathyVal Plant does not contain any benzene.
	NESHAP Part 63 Subpart A - General Provisions.	DOES NOT APPLY. Rhodia is not a major source of HAPs.
	NESHAP Part 63 Subpart FFFF - National Emission Standard for Hazardous Air Pollutants: Miscellaneous Organic Chemica Manufacturing	DOES NOT APPLY. Rhodia is not a major source of HAPs.
	NESHAP Part 64 - Compliance Assurance Monitoring	DOES NOT APPLY. No emission sources emit the major threshold amount of any pollutant.
	LAC 33:III Chapter 21, Subchapter L - Limiting Volatile Organic Compound Emissions from Cleanup Solvent Processing	DOES NOT APPLY. Rhodia does not have any affected cleaning operations according to the definition because the plant does not use solvents with vapor pressure >1.5 psia for cleaning operations.

# **CATHYVAL Plant**

# Agency Interest No.: 1314 Rhodia, Inc.

XI. Table 2. Explanat	ion for Exemption Status or Non-applicability of a Source	
UNF001 Facility (cont'd)	LAC 33:III Chapter 51 - Comprehensive Toxic Air Pollution Emissions Control Program [LAC 33:III.5109.A]	DOES NOT APPLY. The CathyVal plant does not emit any class I or class II TAPs for which sitewide emissions exceed the MER.
EQT009, EQT015 Tank Farm Scrubbers	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Vanessa is not a batch process.
EQT010, EQT011, EQT012, EQT013, EQT020, EQT022,		
EQT023, EQT025, EQT026, EQT029,		
EQT038, EQT041, EQT042, EQT044, EQT054, EQT055,		
EQT058 - EQT059, EQT61 - EQT68,		
EQT070, EQT071, EQT073, EQT074, EQT261		
Tanks	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
EQT019, EQT021, EQT028, EQT031, EQT040, EQT045 Scrubbers	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. Vanessa does not produce any products on the list of SOCMI chemicals provided in LAC 33:III.Chapter 21.Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Vanessa is not a batch process.
EQT016 Storage Tank	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explana	tion for Exemption Status or Non-applicability of a Source	
EQT16		
Storage Tank	40 CFR 60 Subpart Kb - Standards of Performance for Storage	
(cont'd)	Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Vapor pressure is less than 0.51 psia.
EQT017, EQT018		
Storage Tanks	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
	40 CFR 60 Subpart Kb - Standards of Performance for Storage	DOES NOT APPLY. Capacity is less than 39,900 gallons and vapor
	Vessels for Volatile Organic (and Petroleum) Liquids	pressure is less than 2.2 psia.
EQT024, EQT027,		
EQT035, EQT039,		·
EQT043, EQT046,	•	
EQT048, EQT049, EQT077-EQT081,		
EQT083, EQT088,		
EQT090 - EQT093,		·
EQT095, EQT096,		
EQT098-EQT105,		·
EQT137, EQT188 -		
EQT 207, EQT209 -		
EQT 216, EQT218 -		· ·
EQT232, EQT254,		
EQT256		
	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT. Emits less than 100 lb VOC in a 24-hour period.
EQT051	LAC 33:III Chapter 13 - Emissions Standards for Particulate	EXEMPT. PM <sub>10</sub> emissions are well below the allowable emission rate
	Matter - Opacity Limits [LAC 33.III.1311.C]	specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT139		DOES NOT APPLY. The maximum true vapor pressure of the VOCs
High Purity PC	LAC 33:III Chapter 21 - VOC Loading	loaded is less than 1.5 psia.
Mixing Vessel		
Domana Former	LAC 33:III Chapter 21 - Waste Gas Disposal	EXEMPT. Emits less than 100 lb VOC in a 24-hour period.
EQT030, EQT053	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.
Tanks	40 CFR 60 Subpart Kb - Standards of Performance for Storage	DOES NOT APPLY. Capacity is less than 39,900 gallons and vapor
	Vessels for Volatile Organic (and Petroleum) Liquids	pressure is less than 2.2 psia.

#### **CATHYVAL Plant**

# Agency Interest No.: 1314

# Rhodia, Inc. Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explana	tion for Exemption Status or Non-applicability of a Source	
EQT052 Tank Farm Scrubber	LAC 33:III Chapter 21 - VOC Loading	DOES NOT APPLY. The maximum true vapor pressure of the VOCs loaded is less than 1.5 psia.
	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. Daphne does not produce any products on the list of SOCMI chemicals provided in LAC 33:III Chapter 21, Appendix A.
Pomore	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Although some sections of the Daphne unit are batch operated, there are no batch process vents routed to this scrubber.
EQT056 Vent Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. Daphne does not produce any products on the list of SOCMI chemicals provided in LAC 33:III Chapter 21, Appendix A.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. No control is required for the batch process vents venting to the scrubber because the pool of non-exempt batch process vents from the Daphne unit is controlled with overall 90% efficiency utilizing other control equipment.
EQT069, EQT072, EQT236, EQT237, EQT238 Tanks	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. Mass annual emission is less than 500 lb/yr. [LAC 33:III.2149.A.2.b]
EQT075 Baghouse	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33.III.1311.C]	EXEMPT. PM <sub>10</sub> emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT076 Vent Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. If it can be demonstrated that a TRE index value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter.
	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT082 Tank Farm Scrubber	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. There are no distillation or reactor vents routed to this scrubber. [LAC 33:III.2147.A]
EQT084 - EQT086	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQ1004 - EQ1000	LAC 33:III Chapter 21 - Storage of VOCs	DOES NOT APPLY. Vapor pressure is less than 1.5 psia.

# CATHYVAL Plant Agency Interest No.: 1314 Rhodia, Inc.

XI. Table 2. Explana	tion for Exemption Status or Non-applicability of a Source	
EQT084 – EQT086 Tanks (cont'd)	40 CFR 60 Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic (and Petroleum) Liquids	DOES NOT APPLY. Vapor pressure is less than 0.51 psia.
EQT089 Vent Scrubber	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT094 Vent Scrubber	LAC 33:III Chapter 21 Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. If it can be demonstrated that a TRE index value is greater than 1.0 prior to the use of a recovery device, then such recovery device is not subject to the requirements of this Subchapter.
·	LAC 33:III Chapter 21, Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT097 Seal Pot	LAC 33:III Chapter 21, Subchapter J - Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY. There are no distillation or reactor vents routed to this scrubber. [LAC 33:III.2147.A]
	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	DOES NOT APPLY. Cathy is not a batch process. [LAC 33:III.2149]
EQT106, EQT107, EQT109, EQT110, EQT111, EQT112, EQT115, EQT116 Baghouses	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33.III.1311.C]	EXEMPT. PM <sub>10</sub> emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]
EQT113, EQT114 Heaters	LAC 33:III Chapter 15 - Emission Standards for Sulfur Dioxide	EXEMPT. Emissions from this unit are less than 250 tpy; therefore, Rhodia requests exemption from this requirement per LAC 33:III.1503.C.
FUG004 Cathy Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	EXEMPT. If an affected facility produces heavy liquid chemicals only from heavy liquid feed of raw materials, then it is exempt from 40 CFR 60.482-1 through 40 CFR 60.482-10. [40 CFR 60.480(d)(3)]
FUG005 Daphne Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	DOES NOT APPLY. No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Daphne unit. [40 CFR 60.480]
FUG001 Vanessa Fugitives	40 CFR 60 Subpart VV - Standards of Performance for SOCMI Equipment Leaks of VOC	DOES NOT APPLY. No chemicals listed in 40 CFR 60.489 are produced as intermediates or final products at the Vanessa unit. [40 CFR 60.480]
EQT125 Cooling Towers	LAC 33:III Chapter 13 - Emissions Standards for Particulate Matter - Opacity Limits [LAC 33.III.1311.C]	EXEMPT. PM <sub>10</sub> emissions are well below the allowable emission rate specified in Table 3 of LAC 33:III Chapter 13. [LAC33.III.1311.E]

## **CATHYVAL Plant**

## Agency Interest No.: 1314

#### Rhodia, Inc.

### Baton Rouge, East Baton Rouge Parish, Louisiana

EQT126 CATHYVAL Sumps	LAC 33:III Chapter 21 Subchapter M - Limiting VOC Emissions from Industrial Wastewater	EXEMPT. Any affected plant with an annual VOC loading in wastewater <10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B. [LAC 33:III.2153.G.1].
GRP014 Wastewater Treatment	LAC 33:III Chapter 21 Subchapter M - Limiting VOC Emissions from Industrial Wastewater	EXEMPT. Any affected plant with an annual VOC loading in wastewater <10 Mg (11.03 tons) shall be exempt from the control requirements of Subsection B. [LAC 33:III.2153.G.1]
EQT128 RAG layer Diverting Tank	LAC 33:III Chapter 21 Subchapter K - Limiting VOC Emissions from Batch Processing	EXEMPT. Mass annual emission is less than 500 lb/yr. [LAC 33:III.2149.A.2.b]

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

#### **General Information**

# Al ID: 1314 Rhodia Inc

#### Activity Number: PER20120002 Permit Number: 2184-V3

#### Air - Title V Regular Permit Minor Mod

iso Known As:	ID	Name	User Group	Start Date	
	2203300033	AFS (EPA Air Facility System)	AFS (EPA Air Facility System)	01-01-2000	
	0840-00033	CDS Number	CDS Number	08-05-2002	
	8215111	EPA EIS Facility Site ID	EPA EIS Facility Site ID	01-01-2008	
	LAD008161234	Rhodia Inc	Hazardous Waste Notification	11-17-1980	
	PMT/PC	GPRA Baselines	Hazardous Waste Permitting	10-01-1997	
	00861	Rhone Ponienc Basic Chemical Co	Inactive & Abandoned Sites	11-23-1999	
1	LAD008161234	Stauffer Chemical Co Baton Rouge	Inactive & Abandoned Sites	11-23-1999	
	LA0005223	LPDES#	LPDES Permit #	05-22-2003	
		Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006	
	GL-349	Radiation General License	Radiation License Number	12-14-2000	
)	LA-338A-N01	Radioactive Material License	Radiation License Number	12-14-2000	
	G-033-3198	Site ID #	Solid Waste Facility No.	11-21-1999	
	22318	Rhone Poulenc Basic Chemical Co Baton Rouge	TEMPO Merge	01-07-2002	
	38329	Stauffer Chemical	TEMPO Merge	11-19-2001	
ann ann an Araba	38427	Rhodia Inc	TEMPO Merge	01-11-2001	
	70821STFFRAIRLI	TRI#	Toxic Release Inventory	07-19-2004	
sysical Location:	1275 Airline Hwy Baton Rouge, LA 70805		N	Main FAX: 2253593722 Nain Phone: 2253593481	
iling Address:	1275 Airline Hwy Baton Rouge, LA 70805				
cation of Front Gate:	30.508417 latitude, -91.18	7938 longitude, Coordinate Method: Lat.\Long - Decimal Degree	es, Coordinate Datum: NAD83		
lated People:	Name	Malling Address	Phone (Type)	Relationship	
	S. B. "Bala" Balachandran	PO Box 828 Baton Rouge, LA 708210828	2253593443 (WF)	Accident Prevention Contact for	
	S. B. "Bala" Balachandran		2253593742 (WP)	Accident Prevention Contact for	
	Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation Contact For	
	Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Radiation License Billing Party for	
	Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Water Billing Party for	
	Tricia Castille	PO Box 828 Baton Rouge, LA 70821	2253593410 (WP)	Haz. Waste Billing Party for	
	J. Marcus Lewis	PO Box 828 Baton Rouge, LA 708210828	2253567111 (WP)	Responsible Official for	
	John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Air Permit Contact For	
	John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Air Permit Contact For	

PO Box 828 Baton Rouge, LA 70821

John Richardson

Accident Prevention Billing Party for

JOHN.RICHARDSOI

#### **General Information**

#### Al ID: 1314 Rhodia Inc

#### Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

Name	Mailing Address	Phone (Type)	Relationship
John Richardson	PO Box 828 Baton Rouge, LA 70821	2253593768 (WP)	Accident Prevention Billing Party for
John Richardson	PO Box 828 Baton Rouge, LA 70821	JOHN.RICHARDSOI	Emission Inventory Facility Contact for
John Richardson		2253593768 (WP)	Emission Inventory Facility Contact for
Daniel Tate	PO Box 828 Baton Rouge, LA 708210828		Responsible Official for
Name	Address	Phone (Type)	Relationship
Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359-3768 (WP)	Air Billing Party for
Rhodia Inc			Operates
Rhodia Inc			Agent of Service for
Rhodia Inc	<del>_</del>	225-359-3768 (WP)	Emission Inventory Billing Party
Rhodia Inc	1275 Airline Hwy Baton Rouge, LA 70805	225-359 <b>-</b> 3768 (WP)	Owns
		220-30 <del>9-</del> 3708 (VVP)	
	John Richardson John Richardson John Richardson Daniel Tate  Name  Rhodia Inc Rhodia Inc Rhodia Inc Rhodia Inc Rhodia Inc Rhodia Inc Rhodia Inc	John Richardson PO Box 828 Baton Rouge, LA 70821 John Richardson PO Box 828 Baton Rouge, LA 70821 John Richardson PO Box 828 Baton Rouge, LA 70821 Daniel Tate PO Box 828 Baton Rouge, LA 708210828  Name Address  Rhodia Inc 1275 Airline Hwy Baton Rouge, LA 70805 Rhodia Inc 1275 Airline Hwy Baton Rouge, LA 70805 Rhodia Inc c/o CT Corporation System Baton Rouge, LA 70808 Rhodia Inc 1275 Airline Hwy Baton Rouge, LA 70805	John Richardson         PO Box 828 Baton Rouge, LA 70821         2253593768 (WP)           John Richardson         PO Box 828 Baton Rouge, LA 70821         JOHN.RICHARDSOI           John Richardson         PO Box 828 Baton Rouge, LA 70821         2253593768 (WP)           Daniel Tate         PO Box 828 Baton Rouge, LA 708210828           Name         Address         Phone (Type)           Rhodia Inc         1275 Airline Hwy Baton Rouge, LA 70805         225-359-3768 (WP)           Rhodia Inc         1275 Airline Hwy Baton Rouge, LA 70805         225-359-3768 (WP)           Rhodia Inc         1275 Airline Hwy Baton Rouge, LA 70805         225-359-3768 (WP)           Rhodia Inc         1275 Airline Hwy Baton Rouge, LA 70805         225-359-3768 (WP)           Rhodia Inc         1275 Airline Hwy Baton Rouge, LA 70805         225-359-3768 (WP)           Rhodia Inc         1275 Airline Hwy Baton Rouge, LA 70805         225-359-3768 (WP)

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may email your changes to facupdate@la.gov.

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3 Air - Title V Regular Permit Minor Mod

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval I	Diant					
	101 - LIGHTS TANK FARM SCRUBBER C-165				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
EQT 0009	D 440 VANILLIA OLIVENTA TANK (MIDICOTORIA DEL S	0.100				8760 hг/yr
	D-148 - VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D- 148	9120 gallons	11.08 MM gallons/yr	5.54 MM gallons/yr	VANILLIN SÖLVENT 1 TANK (MIBK STORAGE)	8760 hr/yr
į	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	9120 gallons	11.08 MM gallons/yr	5.54 MM gallons/yr	MIBK STORAGE	8760 hr/yr
	D-152 - SOLVENT 2 TANK (MIBK STORAGE) D-152	15400 gallons	19.3 MM gallons/yr	9.65 MM gallons/yr	MIBK STORAGE	8760 hr/yr
	D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153	15400 gallons	19.3 MM gallons/yr	9.65 MM gallons/уг	MIBK STORAGE	8760 hr/yr
	D-169 - SOLVENT 3 TANK (METHANOL STORAGE) D-169	11200 gallons	5.08 MM gallons/yr	5.08 MM gallons/yr	METHANOL / ETHANOL	8760 hr/yr
	102 - HEAVIES TANK FARM SCRUBBER C-187					8760 hr/yr
	D-107 (Vanessa) - GUAIACOL STORAGE TANK D-107	45685 gallons	1.68 MM gallons/yr	1.68 MM gallons/yr		8760 hr/yr
	D-111 (Vanessa) - GUETOL STORAGE TANK D-111	31725 gallons	1.57 MM gallons/yr	1.57 MM gallons/yr		8760 hr/yr
	D-113 (Vanessa) - GLYOXYLIC ACID STORAGE TANK D- 113	31725 gallons				8760 hr/ýr
	103 - CONDENSATION SCRUBBER C-201					8760 hr/yr
	C-216 - GUAIACOL RECYCLE TANK C-216	780 gallons				8760 hr/yr
	104 - SOLVENT 1 VENT SCRUBBER C-248					8760 hr/yr
	C-236 - NEUTRALIZATION SURGE TANK C-236	1587 gallons				8760 hr/yr
	C-240 - EXTRACTOR TAILS UPSET TANK C-240	2570 gallons				.8760 hr/yr
	C-243 - EXTRACTOR 1 TAILS SAFETY DECANTER C-243	900 gallons			i	8760 hr/yr
	C-244 - MANDELATE SURGE TANK C-244	2570 gallons				8760 hr/yr
	C-249 - SOLVENT 1 SURGE TANK C-249	1600 gallons				8760 hr/yr
	C-247 - SOLVENT 1 WASHING SAFETY DECANTER C-247	225 gallons				8760 hr/yr
	105 - OXIDATION SCRUBBER C-419					8760 hr/yr
QT 0029	C-409 - MANDELATE SURGE TANK C-409	2575 gallons				8760 hr/yr
	C-417 - OXIDATION SURGE TANK D-417	22000 gallons				8760 hr/yr
QT 0031						8760 hr/yr
	C-421 - SOLVENT 2 SURGE TANK C-421	1785 gallons				8760 hr/yr
	C-430 - SOLVENT 2 DECANTER C-430	2000 gallons				8760 hr/yr
QT 0034		8000 gallons				8760 hr/yr
QT 0035		1400 gallons				8760 hr/yr
	C-441 - AQUEOUS PHASE SURGE TANK C-441	4100 gallons				8760 hr/yr
QT 0037		8095 gallons				8760 hr/yr
QT 0038		2700 galions				8760 hr/yr
QT 0039		70 gallons			-	8760 hr/yr
QT 0040						8760 hr/yr
QT 0041	[	2885 gallons				8760 hr/yr
QT 0042		3870 gallons			-	8760 hr/yr
EQT 0043		1060 gallons				8760 hr/yr
EQT 0044	C-655 - MELTER SURGE TANK C-655	1735 gallons				8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
	N4					
Cathyval F			•			
QT 0045	108 - CRYSTALLIZATION SCRUBBER C-624			T	** <del>- · · · · · · · · · · · · · · · · · · </del>	8760 hr/yr
	C-541 - METHANOL WASHING DRUM C-541 (Vents through C-801)	600 gallons				8760 hr/yr
QT 0047		6000 gallons	·		, , , , , , , , , , , , , , , , , , , ,	.8760 hr/yr
	C-603 - DISOLVER C-603	2300 gallons				8760 hr/yr
QT 0049	C-606 - VACUUM CRYSTALLIZER C-606	3710 gallons				8760 hr/vr
QT 0050	C-617 - CENTRIFUGE SURGE TANK C-617	2385 gallons				8760 hr/yr
QT 0051	109 - BAGHOUSE FILTER/SCRUBBER C-704					8760 hr/yr
QT 0052	201 - TANK FARM SCRUBBER C-146					8760 hr/yr
QT 0053	D-111 (Daphne) - PYROCATECHOL STORAGE TANK	27165 gallons	1.74 MM gallons/yr	1.74 MM gallons/yr	PYROCATECHOL	8760 hr/yr
QT 0054	D-128 - TARS STORAGE TANK D-128	7050 gallons	1 MM gallons/yr	1 MM gallons/yr	TARS	8760 hr/yr
	D-141 - VERATROLE STORAGE TANK D-141	5825 gallons	.21 MM gallons/yr	.21 MM gallons/yr	VERATROL	8760 hr/yr
	202 - VENT SCRUBBER C-685					8760 hr/yr
QT 0057	C-201 - PC DISSOLUTION TANK C-201	4750 gallons				8760 hr/yr
QT 0058	C-553 - GUAIACOL DISTILLATION FEED TANK C-553	8000 gallons				8760 hr/yr
QT 0059	C-561 - RECYCLE PROCESS WATER TANK C-561	3100 gallons	-			8760 hr/yr
QT 0060	C-603 - GUAIACOL DISTILLATION KETTLE C-603	8800 gallons				8760 hr/yr
QT 0061	C-615 - TARS RECEIVER C-615	1150 gallons				8760 hr/yr
QT 0062	C-645 - PMDB RECEIVER C-645	2500 gallons	•			8760 hr/yr
	C-651 - PC RECEIVER C-651	2100 gallons				8760 hr/yr
	C-655 - GUAIACOL LT. ENDS RECEIVER C-655	500 gallons				8760 hr/yr
	C-660 - INTERS./VERATROLE RECEIVER C-660	1325 gallons				8760 hr/yr
QT 0066	C-665 - SECOND RECEIVER C-665	750 gallons				8760 hr/yr
QT 0067	C-670 - END OF CAMPAIGN RECEIVER C-670	1300 gallons				8760 hr/yr
QT 0068	C-675 - GUAIACOL RECEIVER C-675	5227 gallons			<del></del>	8760 hr/yr
QT 0069	C-701 - CRUDE VERATROLE WASH TANK C-701	1550 gallons				8760 hr/yr
QT 0070	C-705 - WATER GUAIACOLATE RECEIVER C-705	1325 gallons				8760 hr/yr
	C-710 - CAUSTIC WASH RECEIVER C-710	897 gallons				8760 hr/yr
QT 0072	C-751 - VERATROLE DISTILLATION KETTLE C-751	980 gallons				8760 hr/yr
QT 0073	C-765 - LT. ENDS RECEIVER C-765	110 gallons				8760 hr/yr
QT 0074	C-770 - DISTILLED VERATROLE RECEIVER C-770	800 gallons				8760 hr/yr
QT 0075	203 - BAGHOUSE FOR HQ HANDLING					1000 hr/yr
	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)				PP 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	8760 hr/yr
	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223	765 gallons				8760 hr/yr
	C-416 - PREDEPHENOL REFLUX DRUM C-416	2937 gallons				8760 hr/yr
	C-508 - VERTICAL TAR DILUTER C-508	264 gallons				8760 hr/yr
QT 0080	C-530 - DISTILLATION DRAN TANK C-530	761 gailons				8760 hr/yr

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3 Air - Title V Regular Permit Minor Mod

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
·						
Cathyval P	Plant	:				en en de la companya de la manda de la companya de la companya de la companya de la companya de la companya de
QT 0081	C-532 - TAILS SURGE DRUM C-532	4635 gallons		T		8760 hr/yr
QT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)					8760 hr/yr
QT 0083	C-113 - PHENOL UNLOADING TANK C-113	1000 gallons				8760 hr/yr
QT 0084	D-107 - WASHWATER TANK D-107	88900 gallons				8760 hr/yr
	D-111 - PHENOL MAKE-UP TANK D-111	66100 gallons				8760 hr/yr
QT 0086	D-115 - WASHWATER/GUAIACOL TANK D-115	42300 gallons				8760 hr/yr
QT 0087	D-315 - RAFFINATE TANK D-315	58000 gallons				8760 hr/yr
	D-204 - RECYCLE PHENOL TANK D-204	18500 gallons			-	8760 hr/yr
QT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D.	<u> </u>				8760 hr/yr
	F402)				•	0100111791
	C-320 - IPE STORAGE TANK C-320	23978 gallons				8760 hr/yr
	C-308 - IPE SETTLER C-308	6780 gallons				8760 hr/yr
	C-311 - WASHWATER DRUM C-311	6822 gallons				8760 hr/yr
	C-322 - ETHER DRAIN TANK C-322	673 gallons	<u> </u>			8760 hr/yr
QT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)					8760 hг/yr
	C-551 - PC RECEIVING DRUM C-551	500 gallons				8760 hr/yr
QT 0096	1	500 gallons				8760 hr/yr
QT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)					8760 hr/yr
		350 gallons				8760 hr/yr
	D-607 - HQ DISSOLVER TANK D-607	· 1375 gallons				8760 hr/yr
	D-610 - HQ SURGE TANK D-610	7000 gallons				8760 hr/yr
	D-612 - CARBON TREATER TANK D-612	700 gallons				8760 hr/yr
	D-632 - CRYSTALLIZATION TANK D-632	1763 gallons				8760 hr/yr
	D-652 - MOTHER LIQUOR SURGE TANK D-652	8068 gallons				8760 hr/yr
	D-653 - CONC. COLUMN FEED TANK D-653	6792 gallons		-		8760 hr/yr
QT 0105	D-657 - MOTHER LIQUOR SURGE DRUM D-657	85 gallons				8760 hr/yr
QT 0106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601					8760 hr/yr
QT 0107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S- 663 FOR D660 (P&I.D. F608)				***************************************	8760 hr/yr
	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)					8760 hr/yr
	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)				*	8760 hr/yr
	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)					8760 hr/yr
	313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)		<u> </u>			8760 hr/yr
QT 0113	315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)		6 MM BTU/hr	6 MM BTU/hr		3024 hr/yr
QT 0114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)		8 MM BTU/hr	8 MM BTU/hr		8760 hr/yr
OT 011E	316 - PRESSURE LEAF FILTER DRYING VENT Y-625	l	0 1010111			8760 hr/yr

#### Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

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ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
athyval P	lant					
	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-	<u> </u>			T	
	760X (P&I.D. F703)					8760 hr/yr
QT 0118	401A - WWT TANK NO. 28 (P&I.D. F101)	600000 gallons		260 gallons/min	WASTEWATER	8760 hr/yr
QT 0119	401B - STORMWATER TANK NO. 29 (P&I.D. F101)	1.5 million gallons		290 gallons/min	STORMWATER	8760 hr/yr
QT 0120	401C - TANK D-197	50000 gallons		48 gallons/min	WASTEWATER	
QT 0121	402A - WEST AERATION BASIN D210	1.53 million		550 gallons/min	WASTEWATER	8760 hr/yr
		gallons		200 ganons/min	WASTEWATER	8760 hr/yr
EQT 0122	402B - EAST AERATION BASIN D213 (P&I.D. F201)	1.53 million		550 gallons/min	WASTEWATER	8760 hr/yr
OT 0122	402C - WEST CLARIFIER D301 (P&I.D. F302)	gallons		_	, ,	0.00.11791
OT 0123	4020 - WEST CLARIFIER D301 (P&I.D. F302) 402D - EAST CLARIFIER D304 (P&I.D. F302)	296200 gallons		550 gallons/min	WASTEWATER	8760 hr/yr
OT 0125	4020 - EAST CLARIFIER D304 (P&I.D. F302)	296200 gallons		550 gallons/min	WASTEWATER	8760 hr/yr
נעו טובס	M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)		19000 gallons/min	19000 gallons/min		8760 hr/yr
QT 0126	M-6 - CATHYVAL SUMPS					
QT 0127	C-101 - IPE SOLVENT STORAGE TANK C-101	8840 gallons				8760 hr/yr
QT 0128	C-351 - RAG LAYER DIVERTING TANK C-351	3430 gallons				8760 hr/yr
QT 0129	C-401 - AQUEOUS PHASE SURGE TANK C-401	6162 gallons				8760 hr/yr
QT 0130	C-352 - RAG LAYER SURGE TANK C-352	1500 gallons				8760 hr/yr
QT 0131	C-461 - AQUEOUS EFFLUENT TANK C-461	715 gallons				8760 hr/yr
QT 0132	C-521 - ORGANIC PHASE SURGE TANK C-521	7070 gallons				8760 hr/yr
QT 0133	C-132 - MeCI STORAGE TANK C-132	14340 gallons				8760 hr/yr
	C-136 - EICI STORAGE TANK C-136	15400 gallons				8760 hr/yr
OT 0135	C-301 - ACIDIFICATION/DECANTATION TANK C-301	8000 gallons				8760 hr/yr
OT 0136	C-503 - DEETHERATION IPE DECANTER C-503	208 gallons				8760 hr/yr
OT 0137	D-681 - SCREENER RESIDUE DISSOLVER D-681	212 gallons				8760 hr/yr
OT 0139	110 - HIGH PURITY PC MIXING VESSEL		0000000 11.4			8760 hr/yr
OT 0188	C-202 - Premixing Reactor	6000 gallons	2200000 lb/yr	2200000 lb/уг		8760 hr/yr
OT 0189	C-207 - Veratrole Stripper					8760 hr/yr
OT 0190	C-217 - No. 1 Condensation Pageton		·			8760 hr/yr
OT 0191	C-219 - No. 2 Condensation Reactor	1500 gallons				8760 hr/yr
OT 0192	C-221 - No. 3 Condensation Reactor	1500 gallons				8760 h <i>rl</i> yr
OT 0193	C-223 - No. 4 Condensation Reactor	1500 gallons			VVV 45 10 10 10 10 10 10 10 10 10 10 10 10 10	8760 hr/yr
	C-225 - No. 5 Condensation Reactor					8760 hr/yr
OT 0195	C-227 - Polishing Reactor	1500 gallons				8760 hr/yr
OT 0196	C-241 - Gualacol Extraction Column					8760 hr/yr
T 0197	C-245 - Solvent 1 Washing Column					8760 hr/yr
OT 0198	C-301 - Guaiacol Recovery Column					8760 hr/yr
0100	C-306 - Gualacol/Tars Separator					8760 hr/yr
OT 0200	C-312 - Solvent 1Stripper Decanter	<del>  </del>				8760 hr/yr
OT 0200	C-314 - Solvent 1Stripper C-314 - Solvent 1Stripper	<del> </del>				8760 hr/yr
Q 1 0201	10-0 14 - Golvent Fothpper					8760 hr/yr

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#### Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Cathyval F	Plant					
	C-316 - Solvent 1 Cold Trap				,	
EOT 0202	C-320 - Gualacol Distillation Reflux Drum					8760 hr/yr
EOT 0203	C-322X - Solvent 1 Vacuum Package Separator					8760 hr/yr
EOT 0205	H-317 - Vacuum System					8760 hr/yr
	C-407 - Oxidation Reactor					8760 hr/yr
OT 0207	C-416 - Oxidation Reactor					8760 hr/yr
-WI 0207	C-429 - CO2 Separator	_				8760 hr/yr
OT 0200	C-435 - Vanillin Extraction Column					8760 hr/yr
OT 0209	C-440 - Solvent 2 Washing Column					8760 hr/yr
-OT 0210	C-504 - Vanillin/Solvent 2 Atm. Distillation Column				1 delegation of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of the design of	8760 hr/yr
OT 0211	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column					8760 hr/yr
OT 0212	C-516 - Solvent 2 Cold Trap					8760 hr/yr
OT 0214	C-510 - Solvent 2 Cold Trap					8760 hr/yr
OT 0045	C-533X - Solvent 2 Vacuum Package Separator				· · · · · · · · · · · · · · · · · · ·	. 8760 hr/ýr
	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)					8760 hr/yr
QT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)					8760 hr/yr
QT 0217	E-428 - Condenser					8760 hr/yr
QT 0218	H-520 - Vacuum System					8760 hr/yr
	C-525 - Tars Removal Column					8760 hr/yr
QT 0220	C-525 - Tars By-Pass Tank					8760 hr/yr
QT 0221	C-545 - Lights Removal Column		····			8760 hr/yr
QT 0222	C-555A/B - Vanillin Cold Traps					8760 hr/yr
QT 0223	C-562X - Vanillin Purification Vacuum Package Separator				***************************************	8760 hr/yr
OT 0224	H-556 - Vacuum System					8760 hr/yr
QT 0225	C-634X - Dryer Scrubber					8760 hr/yr
QT 0226	C-637X - Crystallization Vacuum Package Separator					8760 hr/yr
QT 0227	C-640 - Dryer					8760 hr/yr
QT 0228	C-805 - Solvent 3 Recovery Column		·			8760 hr/yr
QT 0229	H-619 - Vacuum System		·			8760 hr/yr
QT 0230	Y-620 - Centrifuge A					8760 hr/yr
	Y-621 - Centrifuge B		<del>-</del>			8760 hr/yr
	Y-640 - Dryer					8760 hr/yr
QT 0233	C-606 - Guaiacol Distillation Column					8760 hr/yr
QT 0234	C-683X - Guaiacol Vacuum Package Separator			<del>                                     </del>		8760 hr/yr
OT 0235	C-687A/B - Guaiacol Distillation Cold Traps				A.L	8760 hr/yr
QT 0236	C-754 - Veratrole Distillation Column	450 gailons				8760 hr/yr
QT 0237	C-783X - Veratrole Vacuum Separator	3				8760 hr/yr
QT 0238	C-787 - Veratrole Distillation Cold Traps			<del>                                     </del>		8760 hr/yr
OT 0239	C-213 - First Reactor					8760 hr/yr

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#### Subject Item Inventory:

ΙD	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
****						, , , , , , , , , , , , , , , , , , , ,
Cathyval F	Plant			· · · · · · · · · · · · · · · · · · ·		
	C-215 - Second Reactor					8760 hr/yr
	C-217 - Third Reactor					8760 hr/yr
QT 0242	C-219 - Fourth Reactor					8760 hr/yr
	C-231 - Fifth Reactor					8760 hr/yr
QT 0244	C-501 - Detarring Column					8760 hr/yr
	C-521 - Final Dephenoling Column	······································				8760 hr/yr
	E-418 - Phenol Condenser	<del></del>		<del></del>		8760 hr/vr
QT 0247	H-524 - Vacuum System					8760 hr/vr
QT 0248	C-301 - Water Stripper					8760 hr/yr
	C-313 - Extraction Column	···				8760 hr/vr
QT 0250	C-405 - Dehydration Column					8760 hr/yr
QT 0251	E-401 - Solvent Vent Condenser					8760 hr/yr
QT 0252	C-536 - Splitter Column (PC/HQ Separation)					8760 hr/yr
QT 0253	H-545 - Vacuum System					8760 hr/yr
QT 0254	S-560 - PC Flaker					8760 hr/yr
	C-251 - Batch Reactor					8760 hr/yr
QT 0256	H-640 - Vacuum System for Crystallizers	<b>-</b>				
QT 0257	C-451 - Extraction Column			<u> </u>		8760 hr/yr
QT 0258	C-501 - Detheration Column	·				8760 hr/yr
QT 0259	C-511 - Detheration Gualacol Decanter					8760 hr/yr
QT 0260	C-551 - Crude Guaiacol Dehydration Column					8760 hr/yr
QT 0261	C-555 - Wet Gualacol Tank					8760 hr/yr
QT 0286	M-8A - Fire-Water Pump G972A		. 370 horsepower	370 horsepower		8760 hr/yr 100 hr/yr
QT 0287	M-8B - Fire-Water Pump G972B		370 horsepower	370 horsepower		757.14
QT 0288	M-9 - Emergency Diesel Generator for Daphne/Vanessa		500 horsepower	222 horsepower	·	100 hr/yr
	Sump	}	See Horsepower	222 110136p0W61		400 hr/yr
QT 0289	E-318 - Predephenoling Vent Condenser					8760 hr/yr
	E-506 - Detarring Condenser					8760 hr/yr
	F-6V - VANESSA FUGITIVE EMISSIONS				·	8760 hr/yr
	F-6C - CATHY FUGITIVE EMISSIONS					8760 hr/yr
UG 0005	F-6D - DAPHNE FUGITIVE EMISSIONS					8760 hr/yr

#### Stack Information:

<b>ID</b>	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Cathyval Plant							
	NK FARM SCRUBBER C-165	7.5	22.1	.25		70	86
EQT 0015 102 - HEAVIES T	ANK FARM SCRUBBER C-187	7.5	159	.67		8	86

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#### Stack Information:

ID Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Cathyval Plant						(01)
EQT 0019 103 - CONDENSATION SCRUBBER C-201	5.4	15.9	.25		88	86
EQT 0021 104 - SOLVENT 1 VENT SCRUBBER C-248	5.5	16.2	.25		70	86
EQT 0028 105 - OXIDATION SCRUBBER C-419	29.8	970	.83		70	86
EQT 0031 106 - VANILLIN EXTRACTION SCRUBBER C-427	30.4	90	.25		70	86
EQT 0040 107 - DISTILLATION SCRUBBER C-557	1.6	8.2	.33		70	86
EQT 0045 108 - CRYSTALLIZATION SCRUBBER C-624	5.6	16.5	.25		88	86
EQT 0051 109 - BAGHOUSE FILTER/SCRUBBER C-704	75	7952	1.5	***************************************	88	75
EQT 0052 201 - TANK FARM SCRUBBER C-146	5,4	15.9	.25		30	75
EQT 0056 202 - VENT SCRUBBER C-685	75.4	387	.33	······································	85	75
EQT 0075 203 - BAGHOUSE FOR HQ HANDLING	37	435.9	.5		60	
EQT 0076 301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)	9.45	28	.25		35	75
EQT 0082 302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)	20.7	61	.25		32	75
EQT 0089 303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)	7.5	22.1	.25		35	75
EQT 0094 304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)	2.7	7.95	.25		35	75
EQT 0097 306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)	1.97	10.1	.33		70	75
EQT 0106 307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601	34	400	.5		23	
EQT 0107 308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)	34	400	.5		23	
EQT 0109 310 - CARBÓN BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)	34	400	.5		23	
EQT 0110 311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)	42.5	500	.5		59	75
EQT 0111 312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)	42.5	500	.5		59	75
EQT 0112 313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)	34	400	,5		59	75
EQT 0113 315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)	44.2	2085	1		40	700
EQT 0114 315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)	28.6	3760	1.67		15.8	735
EQT 0115 316 - PRESSURE LEAF FILTER DRYING VENT Y-625	283	1452	.33		70	75
EQT 0116 317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)	7.64	360	1		60	75
EQT 0118 401A - WWT TANK NO. 28 (P&I.D. F101)	.8	6 .	.3		45.5	70
EQT 0119 401B - STORMWATER TANK NO. 29 (P&I.D. F101)	.8	6	.3		43.5	70
EQT 0120 401C - TANK D-197	0	.02	.33		16	70
EQT 0121 402A - WEST AERATION BASIN D210					20	
EQT 0122 402B - EAST AERATION BASIN D213 (P&I.D. F201)					20	

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#### Stack Information:

ΙD	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Cathyval F	Plant						
EQT 0123	402C - WEST CLARIFIER D301 (P&I.D. F302)					14	
EQT 0124	402D - EAST CLARIFIER D304 (P&I.D. F302)				***************************************	14	
EQT 0125	M-5 - CATHY (E925) AND VANESSA (É907) COOLING TOWERS (P&I.D. F903)	w					
EQT 0126	M-6 - CATHYVAL SUMPS						
EQT 0139	110 - HIGH PURITY PC MIXING VESSEL	61	20	.08		32	120
EQT 0286	M-8A - Fire-Water Pump G972A	20.4	240	.5		10.6	604
EQT 0287	M-8B - Fire-Water Pump G972B	20.4	240	.5		10.6	604
EQT 0288	M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump	32	377	.5		11.8	285
FUG 0001	F-6V - VANESSA FUGITIVE EMISSIONS						200
FUG 0004	F-6C - CATHY FUGITIVE EMISSIONS						
FUG 0005	F-6D - DAPHNE FUGITIVE EMISSIONS						
GRP 0014	WWT - EMISSIONS CAP - WW TREATMENT PLANT						

ID .	Description	Relationship	ID	Description
QT 0010	D-148 - VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
QT 0011	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
QT 0012	D-152 - SOLVENT 2 TANK (MIBK STORAGE) D-152	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
QT 0013	D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
QT 0014	D-169 - SOLVENT 3 TANK (METHANOL STORAGE) D-169	Controlled by	EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165
QT 0016	D-107 (Vanessa) - GUAIACOL STORAGE TANK D-107	Controlled by	EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187
QT 0017	D-111 (Vanessa) - GUETOL STORAGE TANK D-111	Controlled by	EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187
QT 0018	D-113 (Vanessa) - GLYOXYLIC ACID STORAGE TANK D-113	Controlled by	EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187
QT 0020	C-216 - GUAIACOL RECYCLE TANK C-216	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
QT 0022	C-236 - NEUTRALIZATION SURGE TANK C-236	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
QT 0023	C-240 - EXTRACTOR TAILS UPSET TANK C-240	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
QT 0024	C-243 - EXTRACTOR 1 TAILS SAFETY DECANTER C-243	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
QT 0025	C-244 - MANDELATE SURGE TANK C-244	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
QT 0026	C-249 - SOLVENT 1 SURGE TANK C-249	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
QT 0027	C-247 - SOLVENT 1 WASHING SAFETY DECANTER C-247	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
QT 0029	C-409 - MANDELATE SURGE TANK C-409	Controlled by	EQT 0028	105 - OXIDATION SCRUBBER C-419
QT 0030	C-417 - OXIDATION SURGE TANK D-417	Controlled by	EQT 0028	105 - OXIDATION SCRUBBER C-419
QT 0032	C-421 - SOLVENT 2 SURGE TANK C-421	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427

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Relationship	S:	•		
ID	Description	Relationship	ID	Description
EQT 0033	C-430 - SOLVENT 2 DECANTER C-430	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0034	C-432 - EXTRACTION 2 DRAIN TANK C-432	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0035	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER C-434	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0036	C-441 - AQUEOUS PHASE SURGE TANK C-441	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0037	C-501 - SOLVENT 2 DISTILLATION SURGE TANK C-501	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0038	C-558 - AQUEOUS EFFLUENTS TANK C-558	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0039	C-575 - SOLVENT 2 RECOVERY DECANTER C-575	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0041	C-535 - TARS SURGE TANK C-535	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0042	C-616 - FLAKER SURGE TANK C-616	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0043	C-648 - RECYCLE PRODUCT HOPPER MELTER C-648	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0044	C-655 - MELTER SURGE TANK C-655	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0046	C-541 - METHANOL WASHING DRUM C-541 (Vents through C-801)	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0047	C-801 - SOLVENT 3 RECOVERY FEED TANK C-801	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0048	C-603 - DISOLVER C-603	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0049	C-606 - VACUUM CRYSTALLIZER C-606	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0050	C-617 - CENTRIFUGE SURGE TANK C-617	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0053	D-111 (Daphne) - PYROCATECHOL STORAGE TANK	Controlled by	EQT 0052	201 - TANK FARM SCRUBBER C-146
EQT 0054	D-128 - TARS STORAGE TANK D-128	Controlled by	EQT 0052	201 - TANK FARM SCRUBBER C-146
EQT 0055	D-141 - VERATROLE STORAGE TANK D-141	Controlled by	EQT 0052	201 - TANK FARM SCRUBBER C-146
EQT 0057	C-201 - PC DISSOLUTION TANK C-201	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0058	C-553 - GUAIACOL DISTILLATION FEED TANK C-553	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0059	C-561 - RECYCLE PROCESS WATER TANK C-561	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0060	C-603 - GUAIACOL DISTILLATION KETTLE C-603	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0061	C-615 - TARS RECEIVER C-615	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0062	C-645 - PMDB RECEIVER C-645	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0063	C-651 - PC RECEIVER C-651	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0064	C-655 - GUAIACOL LT. ENDS RECEIVER C-655	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0065	C-660 - INTERS./VERATROLE RECEIVER C-660	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0066	C-665 - SECOND RECEIVER C-665	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0067	C-670 - END OF CAMPAIGN RECEIVER C-670	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0068	C-675 - GUAIACOL RECEIVER C-675	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0069	C-701 - CRUDE VERATROLE WASH TANK C-701	Controlled by	<b>I</b>	202 - VENT SCRUBBER C-685
EQT 0070	C-705 - WATER GUAIACOLATE RECEIVER C-705	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0071	C-710 - CAUSTIC WASH RECEIVER C-710	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0072	C-751 - VERATROLE DISTILLATION KETTLE C-751	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0073	C-765 - LT. ENDS RECEIVER C-765	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
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ID	Description	Relationship	ID	Description
EQT 0074	C-770 - DISTILLED VERATROLE RECEIVER C-770	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0077	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D.
EQT 0078	C-416 - PREDEPHENOL REFLUX DRUM C-416	Controlled by	EQT 0076	F201) 301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0079	C-508 - VERTICAL TAR DILUTER C-508	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0080	C-530 - DISTILLATION DRAN TANK C-530	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0081	C-532 - TAILS SURGE DRUM C-532	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0083	C-113 - PHENOL UNLOADING TANK C-113	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0084	D-107 - WASHWATER TANK D-107	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0085	D-111 - PHENOL MAKE-UP TANK D-111	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0086	D-115 - WASHWATER/GUAIACOL TANK D-115	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0087	D-315 - RAFFINATE TANK D-315	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0088	D-204 - RECYCLE PHENOL TANK D-204	Controlled by	EQT 0082	302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)
EQT 0090	C-320 - IPE STORAGE TANK C-320	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0091	C-308 - IPE SETTLER C-308	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0092	C-311 - WASHWATER DRUM C-311	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0093	C-322 - ETHER DRAIN TANK C-322	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0095	C-551 - PC RECEIVING DRUM C-551	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0096	C-563 - PC FLAKER FEED TANK C-563	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0098	C-650 - REFLUX SURGE DRUM C-650	Controlled by	EQT 0097	β06 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0099	D-607 - HQ DISSOLVER TANK D-607	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0100	D-610 - HQ SURGE TANK D-610	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0101	D-612 - CARBON TREATER TANK D-612	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0102	D-632 - CRYSTALLIZATION TANK D-632	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0103	D-652 - MOTHER LIQUOR SURGE TANK D-652	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0104	D-653 - CONC. COLUMN FEED TANK D-653	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0105	D-657 - MOTHER LIQUOR SURGE DRUM D-657	Controlled by	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)
EQT 0188	C-202 - Premixing Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0189	C-207 - Veratrole Stripper	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0190	C-217 - No. 1 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0191	C-219 - No. 2 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0192	C-221 - No. 3 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0193	C-223 - No. 4 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0194	C-225 - No. 5 Condensation Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201

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ID	Description	Relationship	ID	Description
EQT 0195	C-227 - Polishing Reactor	Controlled by	EQT 0019	103 - CONDENSATION SCRUBBER C-201
EQT 0196	C-241 - Guaiacol Extraction Column	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0197	C-245 - Solvent 1 Washing Column	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0198	C-301 - Guaiacol Recovery Column	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0199	C-306 - Gualacol/Tars Separator	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0200	C-312 - Solvent 1Stripper Decanter	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0201	C-314 - Solvent 1Stripper	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0202	C-316 - Solvent 1 Cold Trap	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0205	H-317 - Vacuum System	Controlled by	EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248
EQT 0206	C-407 - Oxidation Reactor	Controlled by	EQT 0028	105 - OXIDATION SCRUBBER C-419
EQT 0207	C-416 - Oxidation Column	Controlled by	EQT 0028	105 - OXIDATION SCRUBBER C-419
EQT 0208	C-429 - CO2 Separator	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0209	C-435 - Vanillin Extraction Column	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0210	C-440 - Solvent 2 Washing Column	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0213	C-516 - Solvent 2 Cold Trap	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0217	E-428 - Condenser	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0218	H-520 - Vacuum System .	Controlled by	EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427
EQT 0219	C-525 - Tars Removal Column	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0220	C-525 - Tars By-Pass Tank	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0221	C-545 - Lights Removal Column	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0222	C-555A/B - Vanillin Cold Traps	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0224	H-556 - Vacuum System	Controlled by	EQT 0040	107 - DISTILLATION SCRUBBER C-557
EQT 0225	C-634X - Dryer Scrubber	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0226	C-637X - Crystallization Vacuum Package Separator	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0227	C-640 - Dryer	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0228	C-805 - Solvent 3 Recovery Column	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0229	H-619 - Vacuum System	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0230	Y-620 - Centrifuge A	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
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#### Relationships:

ID	Description	Relationship	ID	Description
EQT 0231	Y-621 - Centrifuge B	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0232	Y-640 - Dryer	Controlled by	EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624
EQT 0233	C-606 - Guaiacol Distillation Column	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0234	C-683X - Gualacol Vacuum Package Separator	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0236	C-754 - Veratrole Distillation Column	Controlled by	EQT 0056	
EQT 0237	C-783X - Veratrole Vacuum Separator	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
EQT 0238	C-787 - Veratrole Distillation Cold Traps	Controlled by		202 - VENT SCRUBBER C-685
EQT 0239	C-213 - First Reactor	Controlled by	EQT 0056	202 - VENT SCRUBBER C-685
	J	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0240	C-215 - Second Reactor	Vents to	EQT 0239	C-213 - First Reactor
EQT 0241	C-217 - Third Reactor	Vents to	EQT 0243	C-231 - Fifth Reactor
EQT 0242	C-219 - Fourth Reactor	Vents to	EQT 0241	C-217 - Third Reactor
EQT 0243	C-231 - Fifth Reactor	Vents to	EQT 0240	C-215 - Second Reactor
EQT 0244	C-501 - Detarring Column	Vents to	EQT 0247	H-524 - Vacuum System
EQT 0245	C-521 - Final Dephenoling Column	Vents to	EQT 0247	H-524 - Vacuum System
EQT 0246	E-418 - Phenol Condenser	Controlled by	EQT 0076	
FOT 00/7		Solution by	EQ1 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)
EQT 0247	H-524 - Vacuum System	Controlled by	EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D.
EQT 0248	C-301 - Water Stripper	O-della della		F201)
EQT 0249	C-313 - Extraction Column	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0250	C-405 - Dehydration Column	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0251	E-401 - Solvent Vent Condenser	Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0252		Controlled by	EQT 0089	303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)
EQT 0253	C-536 - Splitter Column (PC/HQ Separation)	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0253	H-545 - Vacuum System	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQT 0256	S-560 - PC Flaker	Controlled by	EQT 0094	304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)
EQ1 0256	H-640 - Vacuum System for Crystallizers	Vents to	EQT 0097	306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)

#### Subject Item Groups:

ID	Group Type	Group Description
GRP 0006	Equipment Group	- Cathy
GRP 0012	Equipment Group	- Daphne
GRP 0013	Equipment Group	- Vanessa
GRP 0014	Equipment Group	WWT - EMISSIONS CAP - WW TREATMENT PLANT
GRP 0022	Equipment Group	Fire Pump Diesel Engines - Fire Pump Diesel Engines
UNF 0001	Unit or Facility Wide	- Cathyval Plant

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ID	Description	Member of Groups
EQT 0009	101 - LIGHTS TANK FARM SCRUBBER C-165	GRP000000013
EQT 0010	D-148 - VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148	GRP000000013
EQT 0011	D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)	GRP000000013
EQT 0012	D-152 - SOLVENT 2 TANK (MIBK STORAGE) D-152	GRP000000013
EQT 0013	D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153	GRP0000000013
EQT 0014	D-169 - SOLVENT 3 TANK (METHANOL STORAGE) D-169	GRP000000013
EQT 0015	102 - HEAVIES TANK FARM SCRUBBER C-187	GRP000000013
EQT 0016	D-107 (Vanessa) - GUAIACOL STORAGE TANK D-107	GRP000000013
EQT 0017	D-111 (Vanessa) - GUETOL STORAGE TANK D-111	GRP000000013
EQT 0018	D-113 (Vanessa) - GLYOXYLIC ACID STORAGE TANK D-113	GRP000000013
EQT 0019	103 - CONDENSATION SCRUBBER C-201	GRP0000000013
EQT 0020	C-216 - GUAIACOL RECYCLE TANK C-216	GRP000000013
EQT 0021	104 - SOLVENT 1 VENT SCRUBBER C-248	GRP0000000013
EQT 0022	C-236 - NEUTRALIZATION SURGE TANK C-236	GRP000000013
EQT 0023	C-240 - EXTRACTOR TAILS UPSET TANK C-240	GRP000000013
EQT 0024	C-243 - EXTRACTOR 1 TAILS SAFETY DECANTER C-243	GRP000000013 GRP000000013
EQT 0025	C-244 - MANDELATE SURGE TANK C-244	GRP000000013 GRP0000000013
EQT 0026	C-249 - SOLVENT 1 SURGE TANK C-249	GRP000000013
EQT 0027	C-247 - SOLVENT 1 WASHING SAFETY DECANTER C-247	GRP000000013 GRP000000013
EQT 0028	105 - OXIDATION SCRUBBER C-419	GRP000000013
EQT 0029	C-409 - MANDELATE SURGE TANK C-409	
EQT 0030	C-417 - OXIDATION SURGE TANK D-417	GRP000000013 GRP00000013
EQT 0031	106 - VANILLIN EXTRACTION SCRUBBER C-427	
EQT 0032	C-421 - SOLVENT 2 SURGE TANK C-421	GRP000000013
EQT 0033	C-430 - SOLVENT 2 DECANTER C-430	GRP000000013
EQT 0034	C-432 - EXTRACTION 2 DRAIN TANK C-432	GRP000000013
EQT 0035	C-434 - EXTRACTION 2 TAILS SAFETY DECANTER C-434	GRP000000013
EQT 0036	C-441 - AQUEOUS PHASE SURGE TANK C-441	GRP000000013
EQT 0037	C-501 - SOLVENT 2 DISTILLATION SURGE TANK C-501	GRP000000013
EQT 0038	C-558 - AQUEOUS EFFLUENTS TANK C-558	GRP000000013
EQT 0039	C-575 - SOLVENT 2 RECOVERY DECANTER C-575	GRP000000013
EQT 0040	107 - DISTILLATION SCRUBBER C-557	GRP000000013
EQT 0041	C-535 - TARS SURGE TANK C-535	GRP000000013
EQT 0042	C-616 - FLAKER SURGE TANK C-616	GRP000000013
EQT 0043	C-648 - RECYCLE PRODUCT HOPPER MELTER C-648	GRP000000013
EQT 0044	C-655 - MELTER SURGE TANK C-655	GRP000000013
EQT 0045	108 - CRYSTALLIZATION SCRUBBER C-624	GRP000000013
EQT 0046	C-541 - METHANOL WASHING DRUM C-541 (Vents through C-801)	GRP000000013
EQT 0047	C-801 - SOLVENT 3 RECOVERY FEED TANK C-801	GRP000000013
EQT 0048	C-603 - DISOLVER C-603	GRP000000013
EQT 0049	C-606 - VACUUM CRYSTALLIZER C-606	GRP000000013
- CG1 0070	0-000 - VACCOM CRYSTALLIZER C-006	GRP000000013

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D	Description	Member of Groups
EQT 0050	C-617 - CENTRIFUGE SURGE TANK C-617	GRP000000013
EQT 0051	109 - BAGHOUSE FILTER/SCRUBBER C-704	GRP000000013
EQT 0052	201 - TANK FARM SCRUBBER C-146	GRP000000012
EQT 0053	D-111 (Daphne) - PYROCATECHOL STORAGE TANK	GRP000000012
EQT 0055	D-141 - VERATROLE STORAGE TANK D-141	GRP0000000012
EQT 0057	C-201 - PC DISSOLUTION TANK C-201	GRP000000012
EQT 0058	C-553 - GUAIACOL DISTILLATION FEED TANK C-553	GRP000000012
EQT 0059	C-561 - RECYCLE PROCESS WATER TANK C-561	GRP000000012
EQT 0060	C-603 - GUAIACOL DISTILLATION KETTLE C-603	GRP000000012
EQT 0061	C-615 - TARS RECEIVER C-615	GRP000000012
EQT 0062	C-645 - PMDB RECEIVER C-645	GRP000000012
EQT 0063	C-651 - PC RECEIVER C-651	GRP000000012
EQT 0064	C-655 - GUAIACOL LT. ENDS RECEIVER C-655	GRP000000012
EQT 0065	C-660 - INTERS./VERATROLE RECEIVER C-660	GRP000000012
EQT 0066	C-665 - SECOND RECEIVER C-665	GRP000000012
EQT 0067	C-670 - END OF CAMPAIGN RECEIVER C-670	GRP0000000012
EQT 0068	C-675 - GUAIACOL RECEIVER C-675	GRP000000012
EQT 0069	C-701 - CRUDE VERATROLE WASH TANK C-701	GRP000000012
EQT 0070	C-705 - WATER GUAIACOLATE RECEIVER C-705	GRP000000012
EQT 0071	C-710 - CAUSTIC WASH RECEIVER C-710	GRP000000012
EQT 0072	C-751 - VERATROLE DISTILLATION KETTLE C-751	GRP000000012
EQT 0073	C-765 - LT. ENDS RECEIVER C-765	GRP000000012
EQT 0074	C-770 - DISTILLED VERATROLE RECEIVER C-770	GRP000000012
EQT 0076	301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)	GRP000000006
EQT 0077	C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223	GRP000000006
EQT 0078	C-416 - PREDEPHENOL REFLUX DRUM C-416	GRP000000006
EQT 0079	C-508 - VERTICAL TAR DILUTER C-508	GRP000000006
EQT 0080	C-530 - DISTILLATION DRAN TANK C-530	GRP000000006
EQT 0081	C-532 - TAILS SURGE DRUM C-532	GRP0000000006
EQT 0083	C-113 - PHENOL UNLOADING TANK C-113	GRP000000006
EQT 0084	D-107 - WASHWATER TANK D-107	GRP000000006
EQT 0085	D-111 - PHENOL MAKE-UP TANK D-111	GRP000000006
EQT 0086	D-115 - WASHWATER/GUAIACOL TANK D-115	GRP000000006
EQT 0087	D-315 - RAFFINATE TANK D-315	GRP000000006
EQT 0088	D-204 - RECYCLE PHENOL TANK D-204	GRP000000006
EQT 0090	C-320 - IPE STORAGE TANK C-320	GRP000000006
EQT 0091	C-308 - IPE SETTLER C-308	GRP000000006
EQT 0092	C-311 - WASHWATER DRUM C-311	GRP0000000006
EQT 0093	C-322 - ETHER DRAIN TANK C-322	GRP000000006
EQT 0095	C-551 - PC RECEIVING DRUM C-551	GRP000000006
EQT 0096	C-563 - PC FLAKER FEED TANK C-563	GRP000000006

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EQT 0098	C-650 - REFLUX SURGE DRUM C-650	GRP000000006
EQT 0099	D-607 - HQ DISSOLVER TANK D-607	GRP0000000006
EQT 0100	D-610 - HQ SURGE TANK D-610	GRP000000006
EQT 0101	D-612 - CARBON TREATER TANK D-612	GRP000000006
EQT 0102	D-632 - CRYSTALLIZATION TANK D-632	GRP000000006
EQT 0103	D-652 - MOTHER LIQUOR SURGE TANK D-652	GRP000000006
EQT 0104	D-653 - CONC. COLUMN FEED TANK D-653	GRP000000006
EQT 0105	D-657 - MOTHER LIQUOR SURGE DRUM D-657	GRP000000006
EQT 0106	307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601	GRP000000006
EQT 0107	308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)	GRP000000006
EQT 0109	310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)	GRP000000006
EQT 0110	311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)	GRP000000006
EQT 0111	312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)	GRP000000006
EQT 0112	313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)	GRP000000006
EQT 0113	315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)	GRP000000006
EQT 0114	315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)	GRP000000006
EQT 0115	316 - PRESSURE LEAF FILTER DRYING VENT Y-625	GRP000000006
EQT 0116	317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)	GRP000000006
EQT 0118	401A - WWT TANK NO. 28 (P&I.D. F101)	GRP000000014
EQT 0119	401B - STORMWATER TANK NO. 29 (P&I.D. F101)	GRP000000014
EQT 0120	401C - TANK D-197	GRP000000014
EQT 0121	402A - WEST AERATION BASIN D210	GRP000000014
EQT 0122	402B - EAST AERATION BASIN D213 (P&I.D. F201)	GRP000000014
EQT 0123	402C - WEST CLARIFIER D301 (P&I.D. F302)	GRP000000014
EQT 0124	402D - EAST CLARIFIER D304 (P&I.D. F302)	GRP000000014
EQT 0127	C-101 - IPE SOLVENT STORAGE TANK C-101	GRP0000000012
EQT 0128	C-351 - RAG LAYER DIVERTING TANK C-351	GRP000000012
EQT 0129	C-401 - AQUEOUS PHASE SURGE TANK C-401	GRP000000012
EQT 0130	C-352 - RAG LAYER SURGE TANK C-352	GRP000000012
EQT 0131	C-461 - AQUEOUS EFFLUENT TANK C-461	GRP000000012
EQT 0132	C-521 - ORGANIC PHASE SURGE TANK C-521	GRP000000012
EQT 0133	C-132 - MeCI STORAGE TANK C-132	GRP000000012
EQT 0134	C-136 - EICI STORAGE TANK C-136	GRP000000012
EQT 0135	C-301 - ACIDIFICATION/DECANTATION TANK C-301	GRP000000012
EQT 0136	C-503 - DEETHERATION IPE DECANTER C-503	GRP000000012 GRP000000012
EQT 0137	D-681 - SCREENER RESIDUE DISSOLVER D-681	GRP000000012 GRP000000006
EQT 0139	110 - HIGH PURITY PC MIXING VESSEL	GRP000000006
EQT 0188	C-202 - Premixing Reactor	GRP0000000000 GRP0000000013
EQT 0189	C-207 - Veratrole Stripper	GRP000000013
EQT 0190	C-217 - No. 1 Condensation Reactor	GRP000000013
EQT 0191	C-219 - No. 2 Condensation Reactor	GRP000000013

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ID	Description	Member of Groups
EQT 0192	C-221 - No. 3 Condensation Reactor	GR>000000013
EQT 0193	C-223 - No. 4 Condensation Reactor	GR=000000013
EQT 0194	C-225 - No. 5 Condensation Reactor	GR <sup>2</sup> 000000013
EQT 0195	C-227 - Polishing Reactor	GR2000000013
EQT 0196	C-241 - Guaiacol Extraction Column	GRP000000013
EQT 0197	C-245 - Solvent 1 Washing Column	GRP000000013
EQT 0198	C-301 - Guaiacol Recovery Column	GRP000000013
EQT 0199	C-306 - Guaiacol/Tars Separator	GRP000000013
EQT 0200	C-312 - Solvent 1Stripper Decanter	GRP000000013
EQT 0201	C-314 - Solvent 1Stripper	GRP000000013
EQT 0202	C-316 - Solvent 1 Cold Trap	GRP000000013
EQT 0203	C-320 - Guaiacol Distillation Reflux Drum	GRP000000013
EQT 0204	C-322X - Solvent 1 Vacuum Package Separator	GRP000000013
EQT 0205	H-317 - Vacuum System	GRP000000013
EQT 0206	C-407 - Oxidation Reactor	GRP000000013
EQT 0207	C-416 - Oxidation Column	GRP0000000013
EQT 0208	C-429 - CO2 Separator	GRP000000013
EQT 0209	C-435 - Vanillin Extraction Column	GRP0000000013
EQT 0210	C-440 - Solvent 2 Washing Column	GRP000000013
EQT 0211	C-504 - Vanillin/Solvent 2 Atm. Distillation Column	GRP000000013
EQT 0212	C-507 - Vanillin/Solvent 2 Vacuum Distillation Column	GRP000000013
EQT 0213	C-516 - Solvent 2 Cold Trap	GRP000000013
EQT 0214	C-533X - Solvent 2 Vacuum Package Separator	GRP000000013
EQT 0215	C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)	GRP000000013
EQT 0216	C-568 - Solvent 2 Recovery Column (Top Rectification)	GRP000000013
EQT 0217	E-428 - Condenser	GRP000000013
EQT 0218	H-520 - Vacuum System	GRP0000000013
EQT 0219	C-525 - Tars Removal Column	GRP000000013
EQT 0220	C-525 - Tars By-Pass Tank	GRP000000013 GRP000000013
EQT 0221	C-545 - Lights Removal Column	
EQT 0222	C-555A/B - Vanillin Cold Traps	GRP000000013
EQT 0223	C-562X - Vanillin Purification Vacuum Package Separator	GRP000000013 GRP000000013
EQT 0224	H-556 - Vacuum System	
EQT 0225	C-634X - Dryer Scrubber	GRP000000013
EQT 0226	C-637X - Crystallization Vacuum Package Separator	GRP000000013
EQT 0227	C-640 - Dryer	GRP000000013
EQT 0228	C-805 - Solvent 3 Recovery Column	GRP00000013
EQT 0229	H-619 - Vacuum System	GRP000000013
EQT 0230	Y-620 - Centrifuge A	GRP000000013
EQT 0231	Y-621 - Centrifuge B	GRP000000013
EQT 0232	Y-640 - Dryer	GRP000000013
~~ UZJZ	1-040 - Diyel	GRP000000013

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#### Group Membership:

ID	Description	Member of Groups
EQT 0233	C-606 - Guaiacol Distillation Column	GRP000000012
EQT 0234	C-683X - Guaiacol Vacuum Package Separator	GRP000000012
EQT 0235	C-687A/B - Guaiacol Distillation Cold Traps	GRP000000012
EQT 0236	C-754 - Veratrole Distillation Column	GRP000000012
EQT 0237	C-783X - Veratrole Vacuum Separator	GRP000000012
EQT 0238	C-787 - Veratrole Distillation Cold Traps	GRP0000000012
EQT 0239	C-213 - First Reactor	GRP000000006
EQT 0240	C-215 - Second Reactor	GRP0000000006
EQT 0241	C-217 - Third Reactor	GRP000000006
EQT 0242	C-219 - Fourth Reactor	GRP0000000006
EQT 0243	C-231 - Fifth Reactor	GRP000000006
EQT 0244	C-501 - Detarring Column	GRP000000006
EQT 0245	C-521 - Final Dephenoling Column	GRP000000006
EQT 0246	E-418 - Phenol Condenser	GRP000000006
EQT 0247	H-524 - Vacuum System	GRP000000006
EQT 0248	C-301 - Water Stripper	GRP000000006
EQT 0249	C-313 - Extraction Column	GRP000000006
EQT 0250	C-405 - Dehydration Column	GRP000000006
EQT 0251	E-401 - Solvent Vent Condenser	GRP000000006
EQT 0252	C-536 - Splitter Column (PC/HQ Separation)	GRP000000006
EQT 0253	H-545 - Vacuum System	GRP000000006
EQT 0254	S-560 - PC Flaker	GRP000000006
EQT 0255	C-251 - Batch Reactor	GRP000000012
EQT 0256	H-640 - Vacuum System for Crystallizers	GRP000000006
EQT 0257	C-451 - Extraction Column	GRP000000012
EQT 0258	C-501 - Detheration Column	GRP000000012
EQT 0259	C-511 - Detheration Gualacol Decanter	GRP000000012
EQT 0260	C-551 - Crude Guaiacol Dehydration Column	GRP000000012
EQT 0261	C-555 - Wet Guaiacol Tank	GRP000000012
EQT 0286	M-8A - Fire-Water Pump G972A	GRP000000022
EQT 0287	M-8B - Fire-Water Pump G972B	GRP000000022
FUG 0001	F-6V - VANESSA FUGITIVE EMISSIONS	GRP000000013
FUG 0004	F-6C - CATHY FUGITIVE EMISSIONS	GRP000000006
FUG 0005	F-6D - DAPHNE FUGITIVE EMISSIONS	GRP000000012
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NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

#### Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0630	0630 Organic Oxides, Alcohols, Glycols (Rated Capacity)	88	MM lbs/yr

Al ID: 1314 - Rhodía Inc Activity Number: PER20120002 Permit Number: 2184-V3

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#### SIC Codes:

2869	Industrial organic chemicals, nec	Al 1314
2869	Industrial organic chemicals, nec	UNF 001

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Air - Title V Regular Permit Minor Mod

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EQT 102	0015												
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310	0110							0.001	0.001	<0.01		i	
311	0111							0.05	0,10	0.22			
312	0112			ļ				0.05	0.10	0.22			
313	0114				·		·	0.01	0.01	0.02			

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

	VOC		
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year
Cathyval Plant			
EQT 0009	0.04		0.16
EQT 0015	0.001		0.01
EQT 0019 103	0.01	0.02	0.05
EQT 0021	0.03	0.03	0,12
EQT 0028	0.12	0.18	0,53
EQT 0031	0.21	0.82	0.90
EQT 0040	<0.001	0.10	0.01
EQT 0045	0.002	0.002	0.01
EQT 0051			
EQT 0052	0.01		0.04
EQT 0056	0.16	1.12	0.78
EQT 0075 203			
EQT 0076	0.01	1.11	0.06
EQT 0082	0.20	13.51	0.88
EQT 0089	0.82	8.21	3.68
EQT 0094 304	0.01	0.30	0.06
EQT 0097 306	0.02	0.03	0.06
EQT 0106 307	[		
EQT 0107	<u> </u>		
EQT 0109			
EQT 0110			<u> </u>
EQT 0111			
EQT 0112	<u> </u>		

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002

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Air - Title V Regular Permit Minor Mod

	CO			NOx			PM10			SO2		
Subject item	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Cathyval Plant												
EQT 0113 315A	0.48	0.48	0.73	0.58	0.58	0.87	0.04	0.04	0.07	0.003	0.003	0.01
EQT 0114 315B	0.65	0.65	2.83	0.77	0.77	3.37	0.06	0.06	0.26	0.005	0.005	0.02
EQT 0115 316							-					
EQT 0116 317							<0.001	0.40	<0.01			
EQT 0125 м-s			,				0.21		0.92			-
EQT 0126 M-6												
EQT 0139 110												
EQT 0288 M-9	1.48	1.48	0.30	6.88	6.88	1.38	0.49	0.49	0.10	0.46	0.46	0.09
FUG 0001 F-6V												* 1997-90-90-90-90-90-90-90-90-90-90-90-90-90-
FUG 0004 F-60												
FUG 0005 F-6D										<u></u>	ļ <u>:</u>	
GRP 0014 wwt												
GRP 0022 Fire Pump Diesel Engine	2,47	2.47	0.12	11.47	11.47	0.57	0.81	0.81	0.04	0.76	0.76	0.04

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Air - Title V Regular Permit Minor Mod

	Voc					
Subject Item	Avg lb/hr	Max Ib/hr	Tons/Year			
Cathyval Plant						
EQT 0113 315A	0.03	0.03	0.05			
EQT 0114 315B	0.04	0.04	0.19			
EQT 0115 316	<0.001	0.004	<0.01			
EQT 0116 317						
EQT 0125 M-5			W 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
EQT 0126 M-5	0.005		0.02			
EQT 0139	0.05	0.06	0.01			
EQT 0288 M-9	0.56	0.56	0.11			
FUG 0001 F-6V	0.11		0.46			
FUG 0004 F-6C	0.26		1.12			
FUG 0005 F-60	0.13		0.59			
GRP 0014 wwt	4.01		17.55			
GRP 0022 Fire Pump Diesel Engine	0.93	0.93	0.05			

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

# **EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0009 101	Methanol	0.001		<0.01
	Methyl isobutyl ketone	0.04		0.16
EQT 0021 104	Methyl isobutyl ketone	0.03	0.03	0.12
EQT 0028 105	Methanol	0.001	0.001	<0.01
	Methyl isobutyl ketone	0.08	0.12	0.35
EQT 0031 106	Methyl isobutyl ketone	0.21	0.82	0.90
EQT 0040 107	Methyl isobutyl ketone	<0.001	0.10	0.01
EQT 0045 108	Methanol .	0.002	0.002	0.01
	Pyrocatechol	0.01		0.03
EQT 0056	Hydroquinone	0.001	0.05	<0.01
	Methanol	0.001	0.005	<0.01
	Pyrocatechol	0.01	0.05	0.02
EQT 0076 301	Hydroquinone	<0.001	0.01	<0.01
	Phenol	0.01	1.00	0.05
	Pyrocatechol	0.002	0.10	0.01
	Phenol	<0.001	0.01	<0.01
EQT 0089 303	Phenol	<0.001	0.01	<0.01
EQT 0094 304	Pyrocatechol	0.01	0.30	0.06
EQT 0097	Hydroquinone	0.01	0.02	0.04
QT 0115 16	Hydroquinone	<0.001	0.004	<0.01
EQT 0045  EQT 0052  EQT 0056  EQT 0076  EQT 0082  EQT 0089  103  EQT 0094  104  EQT 0097  106	Methyl isobutyl ketone	<0.001		<0.01
	Phenol	<0.001		<0.01
	Methanol	0.04		0.18
	Methyl isobutyl ketone	0.01         0.001       0.05         0.001       0.05         0.01       0.05         <0.001	0.28	
UG 0004 -6C	Hydroquinone	0.003		0.01
	Phenol	0.06		0.28
	Pyrocatechol	0.003		0.01
UG 0005 -60	Chloroethane	0.03		0.12
	Hydroquinone	0.001		0.01
	Methyl chloride	0.05		0.23
	Pyrocatechol	0.01		0.03
RP 0014 WT	Methanoi .	0.72		3.16
	Methyl isobutyl ketone	1.74		7.63

# **EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3 Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0014 wwt	Phenol	0.01		0.03
	Pyrocatechol	0.01		0.05
UNF 0001	Chloroethane			0.12
	Hydroquinone			0.09
•	Methanol			3.38
	Methyl chloride			0.23
	Methyl isobutyl ketone			9.46
	Phenol	•		0.39
	Pyrocatechol			0.21

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

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### EQT 0009 101 - LIGHTS TANK FARM SCRUBBER C-165

1	[LAC 33:III.2115. <b>K</b> .4]	Maintain records to demonstrate that the waste gas stream from methanol unloading (line purge) is less than 100 lbs/24-hour period. [LAC
2	[LAC 33:III.501.C.6]	33:III.2115.K.4, LAC 33:III.2115.H.1.c] Flow rate >= 2.0 gallons/min. STATE ONLY.
3	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: Four-hour average Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
4	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
5	[LAC 33:III.501.C.6]	specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.  Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year). STATE ONLY.
6	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
7	[LAC 33:III.5109.A]	Which Months: All Year Statistical Basis: None specified Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

# EQT 0010 D-148 - VANILLIN SOLVENT 1 TANK (MIBK STORAGE) D-148

8	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
9	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	·	33:III.2103.I.1 - 7, as applicable.

### EQT 0011 D-149 - ETHYL VANILLIN SOLVENT 1 TANK (MIBK STORAGE)

10	[LAC 33:111.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
11	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

# EQT 0012 D-152 - SOLVENT 2 TANK (MIBK STORAGE) D-152

12	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
13	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	•	33:III.2103.I.1 - 7, as applicable.

### EQT 0013 D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153

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### EQT 0013 D-153 - SOLVENT 2 TANK (MIBK STORAGE) D-153

14 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

15 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0014 D-169 - SOLVENT 3 TANK (METHANOL STORAGE) D-169

16 [LAC 33:III.2103.A]

Equip with submerged fill pipe.

17 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0015 102 - HEAVIES TANK FARM SCRUBBER C-187

18	[LAC 33:III.501.C.6]	Flow rate >= 3.6 gallons/min. STATE ONLY.
19	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: Four-hour average Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
20	[LAC 33:III.501.C.6]	specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.  Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution
		control system (DCS). STATE ONLY.  Which Months: All Year Statistical Basis: None specified
21	[LAC 33:HI.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
22	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
23	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are

### EQT 0016 D-107 (Vanessa) - GUAIACOL STORAGE TANK D-107

24 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
~	= 110 maximum and tapor problem using the memods in DAC 33.11.2103.11.3.4-c.

emitted from this scrubber. MACT is not required.

25 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

### EQT 0017 D-111 (Vanessa) - GUETOL STORAGE TANK D-111

26	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.	•
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27 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

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### EQT 0018 D-113 (Vanessa) - GLYOXYLIC ACID STORAGE TANK D-113

28 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
29 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

#### EQT 0019 103 - CONDENSATION SCRUBBER C-201

30	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
		for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
		Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
31	[LAC 33:III.501.C.6]	Flow rate >= 2.1 gallons/min. STATE ONLY.
• *		Which Months: All Year Statistical Basis: Four-hour average
32	[LAC 33:III.501.C.6]	Submit annual report to LDEQ by March 31st of each year listing hours that the scrubber operated out of range. STATE ONLY.
33	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all
		organic contents and washed, STATE ONLY.
34	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
35	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution
		control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified

#### EQT 0020 C-216 - GUAIACOL RECYCLE TANK C-216

36	[LAC 33:111.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
37	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.
38	[LAC 33:III.501.C.6]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
		for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are
		emitted from this tank. MACT is not required. STATE ONLY.

### EQT 0021 104 - SOLVENT 1 VENT SCRUBBER C-248

39 (LAC 33:111.2	Equipment/operational data recordice	eping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain	records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmer	tal Quality and the Environmental Protection Agency upon request.
40 [LAC 33:III.	.C.6] Flow rate recordkeeping by electronic	or hard copy at the approved frequency based on the DCS. STATE ONLY.
41 [LAC 33:III.:	.C.6] Scrubber must operate at all times un	ess the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all
	organic contents and washed STATE	ONLY

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### EQT 0021 104 - SOLVENT 1 VENT SCRUBBER C-248

42 [LAC 33:III.501.C.6]	Flow rate >= 1.95 gallons/min. STATE ONLY.
43 [LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: Four-hour average  Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
44 [LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: None specified  Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
45 [LAC 33:III.5109.A]	specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.  Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

#### EQT 0022 C-236 - NEUTRALIZATION SURGE TANK C-236

46 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
47 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

# EQT 0023 C-240 - EXTRACTOR TAILS UPSET TANK C-240

48 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
49 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

# EQT 0024 C-243 - EXTRACTOR 1 TAILS SAFETY DECANTER C-243

50 [LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
· · · · · · · · · · · · · · · · · · ·	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0025 C-244 - MANDELATE SURGE TANK C-244

21	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
52		Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33;III.2103.I.1 - 7, as applicable.

# EQT 0026 C-249 - SOLVENT 1 SURGE TANK C-249

53	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
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### EQT 0026 C-249 - SOLVENT 1 SURGE TANK C-249

54 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

#### EQT 0027 C-247 - SOLVENT 1 WASHING SAFETY DECANTER C-247

55 [LAC 33:III.2115.K]

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Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0028 105 - OXIDATION SCRUBBER C-419

56	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
		for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
		Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
57	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution
		control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
58	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
		specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
59	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all
	•	organic contents and washed. STATE ONLY.
60	[LAC 33:III.501.C.6]	Flow rate >= 18.0 gallons/min. STATE ONLY.
		Which Months: All Year Statistical Basis: Four-hour average
61	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
62	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
		for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are
		emitted from this scrubber. MACT is not required.

#### EQT 0029 C-409 - MANDELATE SURGE TANK C-409

63	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
64	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33·III 2103 I 1 - 7 as applicable

#### EQT 0030 C-417 - OXIDATION SURGE TANK D-417

65 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

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### EQT 0030 C-417 - OXIDATION SURGE TANK D-417

66 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

# EQT 0031 106 - VANILLIN EXTRACTION SCRUBBER C-427

67	[LAC 33:III.2103.I.3]	Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities.
68	[LAC 33:III.2103.I.7]	Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending date/time of the maintenance period in which 95% control is not met.
69	[LAC 33:III.2115.B]	Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
70	[LAC 33:III.2115.J.1]	Which Months: All Year Statistical Basis: None specified  Demonstrate compliance with LAC 33;III.2115 as requested by DEQ.
71	[LAC 33:III.2115.J.2]	
		Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
72	[LAC 33:HI.2115.J]	Comply with LAC 33:III.2115 as soon as practicable but in no event later than August 20, 2003. Comply with the requirements of LAC 33:III.2115 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2115 as a result of a revision of LAC 33:III.2115.
73	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
74	[LAC 33:III.501.C.6]	Temperature <= 42 F. Temperature of scrubber water feed shall be maintained, except when oxidation/neutralization section is shutdown.  Which Months: All Year Statistical Basis: Daily average
75	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.
76	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.
77	[LAC 33:III.501.C.6]	Flow rate >= 2.4 gallons/min. Which Months: All Year Statistical Basis: Daily average
78	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency based on the DCS.  Which Months: All Year Statistical Basis: None specified
79	{LAC 33:III.5109.A}	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

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EQT 0032	C-421	- SOLVENT 2	<b>SURGE TANK C-421</b>
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80 [LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor
	disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or
	sampling is taking place.
81 [LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of
	planned routine maintenance which may not exceed 240 hours per year

Which Months: All Year Statistical Basis: None specified

### **EQT 0033** C-430 - SOLVENT 2 DECANTER C-430

82	[LAC 33:III.2115.B]	Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
		Which Months: All Year Statistical Basis: None specified
83	[LAC 33:III.2115.J.1]	Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
84	[LAC 33:III.2115.J.2]	Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
85	[LAC 33:III.2115.K.4]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0034 C-432 - EXTRACTION 2 DRAIN TANK C-432

88 [LAC 33:III.2115,K]

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86	[LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
87	[LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.  Which Months: All Year Statistical Basis: None specified

### EQT 0035 C-434 - EXTRACTION 2 TAILS SAFETY DECANTER C-434

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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#### EQT 0036 C-441 - AQUEOUS PHASE SURGE TANK C-441

Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

VOC, Total >= 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of

planned routine maintenance which may not exceed 240 hours per year.

Which Months: All Year Statistical Basis: None specified

### EQT 0037 C-501 - SOLVENT 2 DISTILLATION SURGE TANK C-501

91 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or

sampling is taking place.

92 [LAC 33:III.2103.E.1] VOC, Total >= 95 % control efficiency using a vapor loss control system (condenser/scrubber). This limitation does not apply during periods of

planned routine maintenance which may not exceed 240 hours per year.

Which Months: All Year Statistical Basis: None specified

#### EQT 0038 C-558 - AQUEOUS EFFLUENTS TANK C-558

93 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

94 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0039 C-575 - SOLVENT 2 RECOVERY DECANTER C-575

95 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the

Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0040 107 - DISTILLATION SCRUBBER C-557

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

97 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.

98 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges

specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

9 [LAC 33:III.501.C.6] Flow rate >= 1.0 gallons/min. STATE ONLY.

Which Months: All Year Statistical Basis: Four-hour average

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100	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution
	•	control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
101	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all
		organic contents and washed. STATE ONLY.
102	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
		for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are
		emitted from this scrubber. MACT is not required.

### EQT 0041 C-535 - TARS SURGE TANK C-535

103	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
104	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

### EQT 0042 C-616 - FLAKER SURGE TANK C-616

105	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
106	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

#### EQT 0043 C-648 - RECYCLE PRODUCT HOPPER MELTER C-648

107 [LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0044 C-655 - MELTER SURGE TANK C-655

108	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
109	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

#### EQT 0045 108 - CRYSTALLIZATION SCRUBBER C-624

110 [LAC 33:III.2103.E.1]	VOC, Total >= 95 % control efficiency. This limitation does not apply during periods of planned routine maintenance which may not exceed
	240 hours per year.
	Which Months: All Year Statistical Basis: None specified

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# EQT 0045 108 - CRYSTALLIZATION SCRUBBER C-624

111	[LAC 33:III.2103.I.3]	Record date and reason for any maintenance and repair of the applicable control devices and the estimated quantity and duration of VOC emissions during such activities.
11,2	[LAC 33:III.2103.I.7]	Keep records of planned routine maintenance performed on the vapor loss control system, including the duration of each time the vapor loss control system does not meet the 95% VOC control requirement due to the planned routine maintenance. Record starting date/time and ending
113	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to record the control of the premises for at least two years and make such information available to record the control of the premises for at least two years and make such information available to record the control of the premises for at least two years and make such information available to record the premises for at least two years and make such information available to record the premises for at least two years and make such information available to record the premises for at least two years and make such information available to record the premises for at least two years and make such information available to record the premises for at least two years and make such information available to record the premises for at least two years and make such information available to record the premises for at least two years and make such information at least two years and make such information at least two years and make such information at least two years are two years and make such information at least two years and make such information at least two years and make such information at least two years are two years and make such information at least two years are two years and make such information at least two years are two years and years are two years and years are two years a
114	[LAC 33:III.501.C.6]	Flow rate >= 2.1 gallons/min.
115	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: Four-hour average Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.
116	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed.
117	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).
118	[LAC 33:III.5109.A]	Which Months: All Year Statistical Basis: None specified Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber. MACT is not required.

# EQT 0046 C-541 - METHANOL WASHING DRUM C-541 (Vents through C-801)

119	[LAC 33:III.2115.K]
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Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0047 C-801 - SOLVENT 3 RECOVERY FEED TANK C-801

120 [LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor
	disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
121 [LAC 33:HI.2103.E.1]	VOC, Total >= 95 % control efficiency using a vapor loss control system (scrubber). This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.

Which Months: All Year Statistical Basis: None specified

### EQT 0048 C-603 - DISOLVER C-603

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#### EQT 0048 C-603 - DISOLVER C-603

122 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0049 C-606 - VACUUM CRYSTALLIZER C-606

123 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0050 C-617 - CENTRIFUGE SURGE TANK C-617

124 [LAC 33:III.2103.A]

Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or

sampling is taking place.

125 [LAC 33:III.2103.E.1]

VOC, Total >= 95 % control efficiency using a vapor loss control system (scrubber). This limitation does not apply during periods of planned routing maintanance which may not apply during periods of planned

routine maintenance which may not exceed 240 hours per year. Which Months: All Year Statistical Basis: None specified

### EQT 0051 109 - BAGHOUSE FILTER/SCRUBBER C-704

126 [LAC 33:III.1305]	Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to,
	those specified in LAC 33:III.1305,1-7.
197 [[ 47 22 3]] [ 121 ] [ 13	

Particulate matter (10 microns or less) (PM10): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III.Chapter 13, STATE ONLY.

28 [LAC 33:III.501.C.6] Flow rate >= 175.0 gallons/min with excess NaOH. STATE ONLY. Which Months: All Year Statistical Basis: Four-hour average

29 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy once every four hours based on the DCS. STATE ONLY.

130 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

131 [LAC 33:III.501.C.6] Scrubber must operate at all times that the baghouse blower is operational.

Flow rate monitored by flow rate monitoring device at the approved frequency, i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.

Which Months: All Year Statistical Basis: None specified

### EQT 0052 201 - TANK FARM SCRUBBER C-146

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

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### EQT 0052 201 - TANK FARM SCRUBBER C-146

133	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
134	[LAC 33:III.501.C.6]	specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.  Flow rate >= 1.4 gallons/min. STATE ONLY.  Which Months: All Year Statistical Basis: Four-hour average
135	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
` 136	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
137	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: None specified Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
138	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this scrubber for which permitted site-wide emissions are greater than MER. MACT is not required.

# EQT 0053 D-111 (Daphne) - PYROCATECHOL STORAGE TANK

139	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
140	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

### EQT 0054 D-128 - TARS STORAGE TANK D-128

141 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
142 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

# EQT 0055 D-141 - VERATROLE STORAGE TANK D-141

14	3 [LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
14	4 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2103.I.1 - 7, as applicable.

### **EQT 0056** 202 - VENT SCRUBBER C-685

145 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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<b>EQT 0056</b>	202	- VENT	SCRL	JBBER	C-685
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146	[LAC 33:III.2147]	LAC 33:III.Chapter 21, Subchapter J - Limiting VOC Emissions from Reactor Processes and Distillation Operations in the SOCMI. Daphne is subject to LAC 33:III.2147 only if/when producing anisole. Daphne does not currently produce anisole. Before beginning anisole production, Rhodia will determine the applicability of all vents. For all subject vents, Rhodia will come into compliance with LAC 33:III.2147 prior to the startup of anisole campaign.
147	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.
148	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
149	[LAC 33:III.501.C.6]	Which Months: All Year Statistical Basis: None specified Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges
150	[LAC 33:III.501,C.6]	specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.  Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber have been emptied of all organic contents and washed. STATE ONLY.
151	[LAC 33:III.501.C.6]	Flow rate >= 7.0 gallons/min. STATE ONLY. Which Months: All Year Statistical Basis: Four-hour average
152	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

### EQT 0057 C-201 - PC DISSOLUTION TANK C-201

	·
153 [LAC 33:III.2149.C.1]	VOC Total >= 90.0% reduction based on mass amining sets from in the last
100 (===================================	VOC, Total >= 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the
	pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by
	controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.
	II AC 22 IV 2149 C. I as applicable.
	[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
	Which Months: All Year Statistical Basis: None specified
154 [LAC 33:III.2149.G.1.b]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average
•	The state of the s
	flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

# EQT 0058 C-553 - GUAIACOL DISTILLATION FEED TANK C-553

155	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
156		Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

### EQT 0059 C-561 - RECYCLE PROCESS WATER TANK C-561

157	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
107	[EAC 33;111.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002

Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

#### EQT 0059 C-561 - RECYCLE PROCESS WATER TANK C-561

158 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0060 C-603 - GUAIACOL DISTILLATION KETTLE C-603

159 [LAC 33:III.2149.C.11

VOC, Total >= 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.

[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]

Which Months: All Year Statistical Basis: None specified

160 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average

flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

#### **EQT 0061 C-615 - TARS RECEIVER C-615**

161 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

162 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0062 C-645 - PMDB RECEIVER C-645

163 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

164 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0063 C-651 - PC RECEIVER C-651

165 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

166 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0064 C-655 - GUAIACOL LT. ENDS RECEIVER C-655

167 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33 III.2103.H.3.a-e.

168 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

#### EQT 0065 C-660 - INTERS./VERATROLE RECEIVER C-660

169 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

170 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0066 C-665 - SECOND RECEIVER C-665

171 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

172 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0067 C-670 - END OF CAMPAIGN RECEIVER C-670

173 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

[LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0068 C-675 - GUAIACOL RECEIVER C-675

175 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

176 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0069 C-701 - CRUDE VERATROLE WASH TANK C-701

[LAC 33:III.2149.G.1.b] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average

flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

#### EQT 0070 C-705 - WATER GUAIACOLATE RECEIVER C-705

178 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

179 [LAC 33:HI.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0071 C-710 - CAUSTIC WASH RECEIVER C-710

180 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

[LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

### EQT 0072 C-751 - VERATROLE DISTILLATION KETTLE C-751

182 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (sefm), and documentation verifying these values.

#### **EQT 0073** C-765 - LT. ENDS RECEIVER C-765

183 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

184 [LAC 33:III.2103.1]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0074 C-770 - DISTILLED VERATROLE RECEIVER C-770

185 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e,

186 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

### EQT 0075 203 - BAGHOUSE FOR HQ HANDLING

187 [LAC 33:III.1305]

Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to,

those specified in LAC 33:III.1305.1-7.

188 [LAC 33:III.1311.B]

Particulate matter (10 microns or less) (PM10): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in

Table 3 of LAC 33:III. Chapter 13, STATE ONLY.

189 [LAC 33:III.501.C.6]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are

emitted from this baghouse. Determined to be MACT. STATE ONLY.

### EQT 0076 301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)

For up to 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation. STATE ONLY.

191 [LAC 33:III.501.C.6]

Flow rate >= 0.46 gallons/min. STATE ONLY.

192 [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Four-hour average Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.

193 [LAC 33:III.501.C.6]

Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all

194 [LAC 33:III.501.C.6]

organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits.

Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

#### EQT 0076 301 - PHENOLIC REACTOR VENT SCRUBBER C-209 (F&I.D. F201)

195 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution

control system (DCS). STATE ONLY.

Which Months: All Year Statistical Basis: None specified

196 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ

for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which

site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

#### EQT 0077 C-223 - PHENOL DRAIN TANK REACTION SURGE DRUM C-223

197 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the

Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0078 C-416 - PREDEPHENOL REFLUX DRUM C-416

[LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the

Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0079 C-508 - VERTICAL TAR DILUTER C-508

199 [LAC 33:III.2115.K] Equipment/operation

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the

Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0080 C-530 - DISTILLATION DRAN TANK C-530

200 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0081 C-532 - TAILS SURGE DRUM C-532

201 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0082 302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

# EQT 0082 302 - OSBL TANK FARM SCRUBBER C-319 (F&I.D. F107)

202	[LAC 33:III.2115.B]	Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.
	·	Which Months: All Year Statistical Basis: None specified
203	[LAC 33:III.2115.J.1]	Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
204	[LAC 33:III.2115.J.2]	Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC 33:III.2115.J.2.a through e.
205	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.2115.K.1 through K.3. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
206	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per year).
207	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS).  Which Months: All Year Statistical Basis: None specified
208	[LAC 33:III.501.C.6]	Flow rate recordkeeping by electronic or hard copy at the approved frequency based on DCS.
209	[LAC 33:III.501.C.6]	For up to 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation.
210	[LAC 33:III.501.C.6]	Flow rate >= 7.6 gallons/min.  Which Months: All Year Statistical Basis: Four-hour average
211	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

### EQT 0083 C-113 - PHENOL UNLOADING TANK C-113

212	$\Gamma \Lambda C$	33:111.2	115 K 2
414	LPVC	33,111.4	(17.17]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0084 D-107 - WASHWATER TANK D-107

2	13	[LAC	33:.	III.21	.03,I	I.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

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Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

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#### EQT 0084 D-107 - WASHWATER TANK D-107

214 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:HI.2103.I.1 - 7, as applicable.

#### EQT 0085 D-111 - PHENOL MAKE-UP TANK D-111

215 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

216 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0086 D-115 - WASHWATER/GUAIACOL TANK D-115

217 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

218 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

#### EQT 0087 D-315 - RAFFINATE TANK D-315

219 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (scrubber) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent (Note: this requirement does not apply if the unit is shut down and D-315 emits only breathing losses [less than 100 lbs in 24 hours]). Which Months: All Year Statistical Basis: None specified

#### EQT 0088 D-204 - RECYCLE PHENOL TANK D-204

220 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### **EQT 0089** 303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)

221	[LAC 33:III.2147.E.4]	Equipment/operational data recordkeeping by electronic or hard copy as needed Install, calibrate, maintain and operate monitoring device(s) on
		scrubber C-402 and/or condenser E-401 as approved by LDEQ Engineering to demonstrate compliance with TRE index limit specified under
		LAC 33: III 2147 C 2

222 [LAC 33:III.501.C.6]

Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all

organic contents and washed or (2) have their vent line valve closed such that no emissions occur.

223 [LAC 33:III.501.C.6]

Flow rate >= 4.0 gallons/min.
Which Months: All Year Statistical Basis: Four-hour average

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Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

### EQT 0089 303 - IPE SOLVENT VENT SCRUBBER C-402 (P&I.D. F402)

224 [LAC 33:III.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS.

225 [LAC 33:III.501.C.6] Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution

control system (DCS).

Which Months: All Year Statistical Basis: None specified

226 [LAC 33:III.5109.A] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ

for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs for

which site-wide emissions are greater than the MER are emitted from this scrubber. MACT is not required.

#### EQT 0090 C-320 - IPE STORAGE TANK C-320

227 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0091 C-308 - IPE SETTLER C-308

228 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0092 C-311 - WASHWATER DRUM C-311

229 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### **EQT 0093** C-322 - ETHER DRAIN TANK C-322

230 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

## EQT 0094 304 - PC FLAKER VENT SCRUBBER C-561 (P&I.D. F508)

231 [LAC 33:III.501.C.6] For up to 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to

remove pluggage and restore proper operation. STATE ONLY,

232 [LAC 33:HI.501.C.6] Flow rate recordkeeping by electronic or hard copy at the approved frequency based on the DCS. STATE ONLY.

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Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

233	[LAC 33:III.501.C.6]	Scrubber must operate at all times unless the unit is not in operation and the vessels normally vented to the scrubber (1) have been emptied of all
		organic contents and washed or (2) have minimal (e.g., breathing loss) emissions which have been included in the permit emissions limits.  STATE ONLY.
234	[LAC 33:III.501.C.6]	Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. STATE ONLY.
235	[LAC 33:III.501.C.6]	Flow rate monitored by flow rate monitoring device at the approved frequency. i.e. four hour block average based on the plant's distribution control system (DCS). STATE ONLY.
		Which Months: All Year Statistical Basis: None specified
236	[LAC 33:III.501.C.6]	Flow rate >= 0.22 gallons/min, STATE ONLY,
		Which Months: All Year Statistical Basis: Four-hour average
237	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ
		for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are
		emitted from this scrubber, MACT is not required.
		ennued from this serubber, MACT is not required.

### **EQT 0095** C-551 - PC RECEIVING DRUM C-551

238 [LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request

### EQT 0096 C-563 - PC FLAKER FEED TANK C-563

239	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
		for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
		Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0097 306 - SEAL POT D-669 FOR CRYSTALLIZATION (P&I.D. F607)

240 [LAC 33:III.2115.K.4]	Maintain records to demonstrate that each vent routed to the seal pot is less than 100 lbs/24-hour period. [LAC 33:III.2115.K.4, LAC
	33:III.2115.H.1.c]

### EQT 0098 C-650 - REFLUX SURGE DRUM C-650

241	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
		for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	= 1	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0099 D-607 - HQ DISSOLVER TANK D-607

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#### EQT 0099 D-607 - HQ DISSOLVER TANK D-607

242 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0100 D-610 - HQ SURGE TANK D-610

243 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0101 D-612 - CARBON TREATER TANK D-612

244 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0102 D-632 - CRYSTALLIZATION TANK D-632

245 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0103 D-652 - MOTHER LIQUOR SURGE TANK D-652

246 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0104 D-653 - CONC. COLUMN FEED TANK D-653

247 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

## EQT 0105 D-657 - MOTHER LIQUOR SURGE DRUM D-657

248 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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# EQT 0106 307 - SULFITE METABISULFITE BAG DUMP STATION BAGHOUSE S-603 FOR D601

249 [LAC 33:III.1311.B]

Particulate matter (10 microns or less) (PMI0): Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III.Chapter 13. STATE ONLY.

# EQT 0107 308 - OXALIC ACID BAG DUMP STATION BAGHOUSE S-663 FOR D660 (P&I.D. F608)

250 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

251 [LAC 33:III.501.C.6]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. Determined to be MACT. STATE ONLY.

# EQT 0109 310 - CARBON BAG DUMP STATION BAGHOUSE S-615 FOR D618 (P&I.D. F601)

252 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

# EQT 0110 311 - PC PACKAGING BAGHOUSE Y-731 (P&I.D. F703)

253 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

# EQT 0111 312 - HQ PACKAGING BAGHOUSE Y-716 (P&I.D. F703)

254 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

255 [LAC 33:III.5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

# EQT 0112 313 - HQ REWORK DUMPER BAGHOUSE S-693 FOR D607 (P&I.D. F602)

256 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

257 [LAC 33:III.5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.

### EQT 0113 315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)

258 [LAC 33:III.1101.B]

Opacity <= 20 percent, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: None specified

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#### EQT 0113 315A - FLUID HEATER F-962 (BACK-UP) (P&I.D. F927)

259 [LAC 33:III.1313.C]

Total suspended particulate <= 0.6 lb/MMBTU of heat input.

Which Months: All Year Statistical Basis: None specified

#### EQT 0114 315B - PRIMARY FLUID HEATER F-971 (P&I.D. F925)

260 [LAC 33:III.1101.B]

261 [LAC 33:III.1313.C]

Opacity <= 20 percent, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period

in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: None specified

Total suspended particulate <= 0.6 lb/MMBTU of heat input. Which Months: All Year Statistical Basis: None specified

### EQT 0116 317 - VACUUM CLEAN-UP PACKAGING BAGHOUSE Y-760X (P&I.D. F703)

262 [LAC 33:III.1311.B]

Emissions of PM10 shall not exceed the allowable emissions based on process rate listed in Table 3 of LAC 33:III, Chapter 13.

#### EQT 0118 401A - WWT TANK NO. 28 (P&I.D. F101)

263 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

264 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information

specified in LAC 33:III.2103.I.1 - 7, as applicable.

265 [LAC 33:III.2153.F.1]

Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC

33:III.2153.F.1, LAC 33:III.2153.G]

### EQT 0119 401B - STORMWATER TANK NO. 29 (P&I.D. F101)

266 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

267 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information

specified in LAC 33:III.2103.I.1 - 7, as applicable.

268 [LAC 33:III.2153.F.1]

Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC

33:III.2153.F.1, LAC 33:III.2153.G]

# EQT 0120 401C - TANK D-197

269 [LAC 33:III.2103.H.3]

Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.

270 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information

specified in LAC 33:III.2103.I.1 - 7, as applicable.

271 [LAC 33:III.2153.F.1]

Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC

33:III.2153.F.1, LAC 33:III.2153.G]

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272 [LAC 33:III.2153.F.1]

Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

### **EQT 0122** 402B - EAST AERATION BASIN D213 (P&I.D. F201)

273 [LAC 33:III.2153.F.1]

Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

#### EQT 0123 402C - WEST CLARIFIER D301 (P&I.D. F302)

274 [LAC 33:III.2153.F.1]

Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

#### EQT 0124 402D - EAST CLARIFIER D304 (P&I.D. F302)

275 [LAC 33:HI.2153.F.1]

Maintain records to demonstrate that the annual VOC loading in wastewater at the plant is less than or equal to 11.03 tons. [LAC 33:III.2153.F.1, LAC 33:III.2153.G]

# EQT 0125 M-5 - CATHY (E925) AND VANESSA (E907) COOLING TOWERS (P&I.D. F903)

276 [LAC 33:III.5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No additional controls are required.

### EQT 0127 C-101 - IPE SOLVENT STORAGE TANK C-101

277	[LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor
		disposal system capable of processing such organic vapors (combustion). All tank gauging and sampling devices shall be gas-tight except when
		gauging or sampling is taking place.
278	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

279 [LAC 33:III.501.C.6] Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

### EQT 0128 C-351 - RAG LAYER DIVERTING TANK C-351

280	[LAC 33:III.2149.G.1.b]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average
281		flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.  Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

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282	[LAC 33:III.2103.A]	Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors (combustion). All tank gauging and sampling devices shall be gas-tight except when
202	(I A C 22 III 2122 II	gauging or sampling is taking place.
283	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
284	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

EQT 0130 C-352 - RAG LAYER SURGE TANK C-352			
285	[LAC 33:III.2103.A]	Equip with submerged fill pipe.	
286	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.	
287	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.	

### EQT 0131 C-461 - AQUEOUS EFFLUENT TANK C-461

288	[LAC 33:III.2103.A]	Equip with submerged fill pipe.
289	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
•••	<b>F</b> 1 <b>G S S S S S S S S S S</b>	33:III.2103.I.1 - 7, as applicable.
290	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or
	•	current permit.

# EQT 0132 C-521 - ORGANIC PHASE SURGE TANK C-521

291 [LAC 33:II	II.2103.A]	Equip with submerged fill pipe.
292 [LAC 33:II	[I.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
293 [LAC 33:II	I.501.C.6]	33:III.2103.I.1 - 7, as applicable. Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

# EQT 0133 C-132 - MeCI STORAGE TANK C-132

294 [LAC 33:III.2103.A]	Equip with submerged fill pipe.
295 [LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
	33:III.2103.I.1 - 7, as applicable.

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	EQT 0133	C-132 - MeCI	STORAGE TANK C-132	)
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290 [LAC 33:111.301.C.6	296	[LAC 33:III.501.C.6]
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Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or current permit.

#### EQT 0134 C-136 - EtCl STORAGE TANK C-136

297	[LAC	33:III.21	103.A]

Equip with submerged fill pipe.

298 [LAC 33:III.2103.I]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2103.I.1 - 7, as applicable.

299 [LAC 33:III.501.C.6]

Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or

current permit.

### EQT 0135 C-301 - ACIDIFICATION/DECANTATION TANK C-301

VOC, Total >= 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable. [LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]

Which Months: All Year Statistical Basis: None specified

301 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average

flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

302 [LAC 33:III.501.C.6]

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

### EQT 0136 C-503 - DEETHERATION IPE DECANTER C-503

303 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

Which Months: All Year Statistical Basis: None specified

304 [LAC 33:III.501.C.6]

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

# EQT 0137 D-681 - SCREENER RESIDUE DISSOLVER D-681

305 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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#### EQT 0139 110 - HIGH PURITY PC MIXING VESSEL

306 [LAC 33:III.2115.K.4]

Maintain records to demonstrate that the criteria are being met for any exemption claimed.

#### EQT 0188 C-202 - Premixing Reactor

307 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0189 C-207 - Veratrole Stripper

308 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0190 C-217 - No. 1 Condensation Reactor

309 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0191 C-219 - No. 2 Condensation Reactor

310 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0192 C-221 - No. 3 Condensation Reactor

311 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0193 C-223 - No. 4 Condensation Reactor

312 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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#### EQT 0194 C-225 - No. 5 Condensation Reactor

313 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0195 C-227 - Polishing Reactor

314 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0196 C-241 - Guaiacol Extraction Column

315 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0197 C-245 - Solvent 1 Washing Column

316 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request,

### EQT 0198 C-301 - Guaiacol Recovery Column

317 [LAC 33:III,2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0199 C-306 - Guaiacol/Tars Separator

318 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0200 C-312 - Solvent 1Stripper Decanter

319 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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#### EQT 0201 C-314 - Solvent 1Stripper

320 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

## EQT 0202 C-316 - Solvent 1 Cold Trap

321 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

## EQT 0203 C-320 - Guaiacol Distillation Reflux Drum

322 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0204 C-322X - Solvent 1 Vacuum Package Separator

323 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0205 H-317 - Vacuum System

324 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

## EQT 0206 C-407 - Oxidation Reactor

325 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0207 C-416 - Oxidation Column

326 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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#### EQT 0208 C-429 - CO2 Separator

327	[LAC 33:III.2115.B]	Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or
	•	thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal
		efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume,
		whichever is less stringent.
		Which Months: All Year Statistical Basis: None specified
328	[LAC 33:III.2115.J.1]	Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.
329	[LAC 33:III.2115.J.2]	Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the
		proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC
		33:III.2115.J.2.a through e.
330	[LAC 33:III.2115.K.4]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115
		when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at
		least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the
		Environmental Protection Agency upon request.

#### EQT 0209 C-435 - Vanillin Extraction Column

331 [LAC 33:III.2115.K] Ear

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0210 C-440 - Solvent 2 Washing Column

332 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0211 C-504 - Vanillin/Solvent 2 Atm. Distillation Column

333 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0212 C-507 - Vanillin/Solvent 2 Vacuum Distillation Column

334 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

TPOR0147

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

### EQT 0213 C-516 - Solvent 2 Cold Trap

335 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0214 C-533X - Solvent 2 Vacuum Package Separator

336 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0215 C-565 - Solvent 2 Recovery Column (Aqueous Phase Stripper)

337 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0216 C-568 - Solvent 2 Recovery Column (Top Rectification)

338 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0217 E-428 - Condenser

339 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (condenser/scrubber in series) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

Which Months: All Year Statistical Basis: None specified

340 [LAC 33:III.2115.J.1]

Demonstrate compliance with LAC 33:III.2115 as requested by DEQ.

341 [LAC 33:III.2115.J.2]

Install and maintain monitors to accurately measure and record operational parameters of all required control devices as necessary to ensure the proper functioning of those devices in accordance with design specifications. Monitor and record at a minimum the parameters listed in LAC

33:III.2115.J.2.a through e.

342 [LAC 33:III.2115.K.4]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Exempt from LAC 33:III.2115 when oxidation reaction section is shutdown. Maintain the records specified in LAC 33:III.2115.K.4. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3 Air - Title V Regular Permit Minor Mod

#### EQT 0218 H-520 - Vacuum System

343 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0219 C-525 - Tars Removal Column

344 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0220 C-525 - Tars By-Pass Tank

345 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0221 C-545 - Lights Removal Column

346 [LAC 33:III.2115,K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0222 C-555A/B - Vanillin Cold Traps

347 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0223 C-562X - Vanillin Purification Vacuum Package Separator

348 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0224 H-556 - Vacuum System

349 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

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Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3 Air - Title V Regular Permit Minor Mod

#### EQT 0225 C-634X - Dryer Scrubber

350 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

# EQT 0226 C-637X - Crystallization Vacuum Package Separator

351 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0227 C-640 - Dryer

352 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0228 C-805 - Solvent 3 Recovery Column

353 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0229 H-619 - Vacuum System

354 [LAC 33:III.2115,K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

## EQT 0230 Y-620 - Centrifuge A

355 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0231 Y-621 - Centrifuge B

356 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

#### EQT 0232 Y-640 - Dryer

357 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0233 C-606 - Guaiacol Distillation Column

358 [LAC 33:III.2149.G.1,b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

# EQT 0234 C-683X - Guaiacol Vacuum Package Separator

359 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

### EQT 0235 C-687A/B - Guaiacol Distillation Cold Traps

360 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

### EQT 0236 C-754 - Veratrole Distillation Column

361 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

### EQT 0237 C-783X - Veratrole Vacuum Separator

362 [LAC 33:III.2149.G.1.b]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

### EQT 0238 C-787 - Veratrole Distillation Cold Traps

363 [LAC 33:III.2149.G.1.ь]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.

### EQT 0239 C-213 - First Reactor

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

#### EQT 0239 C-213 - First Reactor

364 [LAC 33:III.2147.C.2]	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or
•	without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC
	33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in
	LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without
	the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC
•	33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in
•	LAC 33:III.2147.D.5.

Which Months: All Year Statistical Basis: None specified

365 [LAC 33:III.2147.D.7] Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or

more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.

366 [LAC 33:III.2147.F] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC

33:III.2147.F.1 through F.4, as applicable.

33:III.2147.F.1 through F.4, as applicable.

#### EQT 0246 E-418 - Phenol Condenser

367 [LAC 33:III,2147,C.2]	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or
	without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC
	33:III.2147.D.5.a,i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in
	LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without
·	the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC
	33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in
•	LAC 33:III.2147.D.5.
•	Which Months: All Year Statistical Basis: None specified
368 [LAC 33:III.2147.D.7]	Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or
	more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
369 [LAC 33:III.2147.F]	Equipment/operational data recordkeeping by electronic or hard convicantinuously. Keep records of the information specified in LAC

#### EQT 0247 H-524 - Vacuum System

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

<b>EQT 0247</b>	H-524 -	Vacuum	System
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370	[LAC 33:III.2147.C.2]	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
		Which Months: All Year Statistical Basis: None specified
371	[LAC 33:III.2147.D.7]	Recalculate the flaw rate TOC appropriation and TDE in the state of th
		Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
372	[LAC 33:III.2147.F]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2147.F.1 through F.4, as applicable.

# EQT 0251 E-401 - Solvent Vent Condenser

373	[LAC 33:III.2147.C.2]	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC 33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in LAC 33:III.2147.D.5.
		Which Months: All Year Statistical Basis: None specified
374	[LAC 33:III.2147.D.7]	Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or
		more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations
375	[LAC 33:III.2147.F]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:111.2147.F.1 through F.4, as applicable.
376	[LAC 33:III.501.C.6]	Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of
		all organic contents and washed or (2) have their vent line valve closed such that no emissions occur
377	[LAC 33:III.501.C.6]	The condenser is equipped with a high temperature alarm. The maximum temperature of the water supplied to the condenser shall be maintained
		at 13 degrees Celsius based on a four hour average.

# EQT 0253 H-545 - Vacuum System

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

### EQT 0253 H-545 - Vacuum System

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378	[LAC 33:III.2147.C.2]	Maintain vent stream parameters that result in a calculated TRE index value greater than 1.0 without the use of a VOC control device and with or
	·	without the use of one or more recovery devices. Calculate the TRE index at the outlet of the final recovery device, if any, as specified in LAC.
	A Comment	33:III.2147.D.5,a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in
		LAC 33:III.2147.D.5 TRE index value >= 1 (no units) without the use of volatile organic compound emission control device and with or without
		the use of one or more recovery devices. Calculate the TRE index value at the outlet of the final recovery device, if any, as specified in LAC
		33:III.2147.D.5.a.i except if an affected vent stream is mixed with an unaffected vent stream prior to the final recovery device as specified in
		LAC 33:III.2147.D.5.
	•	Which Months: All Year Statistical Basis: None specified
379	[LAC 33:III.2147.D.7]	Recalculate the flow rate, TOC concentration, and TRE index value within two weeks of any process change that could effect a change in one or
		more of these vent stream parameters. Use the methods and procedures of LAC 33:III.2147 for the recalculations.
380	[LAC 33:III.2147.F]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2147.F.1 through F.4, as applicable.

### EQT 0254 S-560 - PC Flaker

381 [LAC 33:HI.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
	for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

### EQT 0255 C-251 - Batch Reactor

382	[LAC 33:III.2115.K]	Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met
		for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the
202	(I A C 22 III 21 40 C 12	Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
383	[LAC 33:III.2149.C.1]	VOC, Total >= 90 % reduction based on mass emission rate from individual process vent streams in aggregate within a batch process. For the
:		pool of non-exempt batch process vents (C-251, C-301, C-201, and C-603), per LAC 33:III.2149.C.2.a, overall 90% control is achieved by
		controlling only C-251 and C-301 with greater than 99% efficiency. Use the RACT equation specified in LAC 33:III.2149.C.1 as applicable.
		[LAC 33:III.2149.C.1, LAC 33:III.2149.C.2.f]
		Which Months: All Year Statistical Basis: None specified
384	[LAC 33:III.2149.G.1.b]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the annual mass emission total, average
		flow rate in standard cubic feet per minute (scfm), and documentation verifying these values.
385	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant, Regeneration Furnaces Unit 1 or 2, permitted under Part 70 Permit No. 0840-00033-V2 or
		current permit.

# EQT 0256 H-640 - Vacuum System for Crystallizers

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

EQT 0256 H-640 - \	Vacuum System	for Crystallizers
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386 [LAC 33:III.2115.K]

Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.

#### EQT 0257 C-451 - Extraction Column

387 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

388 [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None specified

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

#### EQT 0258 C-501 - Detheration Column

389 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

390 [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None specified

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

### EQT 0259 C-511 - Detheration Guaiacol Decanter

391 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

Which Months: All Year Statistical Basis: None specified

392 [LAC 33:III.501.C.6]

Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

### EQT 0260 C-551 - Crude Guaiacol Dehydration Column

393 [LAC 33:III.2115.B]

Nonhalogenated hydrocarbon burning: Temperature >= 1600 F (870 degrees C) for 0.5 seconds or greater in a direct-flame afterburner or thermal incinerator. Other devices (combustion) will be accepted provided 98 percent or greater VOC destruction or removal efficiency can be demonstrated, as determined in accordance with LAC 33:III.2115.J.1, or if emissions are reduced to 20 ppm by volume, whichever is less stringent.

Which Months: All Year Statistical Basis: None specified

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

# EQT 0260 C-551 - Crude Guaiacol Dehydration Column

394 [LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.
4.4 *	1

# EQT 0261 C-555 - Wet Gualacol Tank

395	[LAC 33:III.2103.H.3]	Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
396 [	[LAC 33:III.2103.I]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
		specified in LAC 33:III.2103.I.1 - 7, as applicable.
397 (	[LAC 33:III.501.C.6]	Emissions routed to Rhodia's Sulfuric Acid Plant permitted under Part 70 Permit No. 0840-00033-V2, or current permit.

# EQT 0288 M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump

398	[40 CFR 63.6595(a)(1)]	40 CFR 63 Subpart ZZZZ requirements become effective May 3, 2013. [40 CFR 63.6595(a)(1)]
399	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first
•		Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)]
400	[40 CFR 63.6603(a)]	Which Months: All Year Statistical Basis: None specified Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first.
		Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)]
40.1	140 GED (2.6604)3	Which Months: All Year Statistical Basis: None specified
401	[40 CFR 63.6603(a)]	Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]
402	[40 CFR 63.6603(a)]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of
		the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]
403	[40 CFR 63.6605(a)]	Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR
		63.6605(a)]
404	[40 CFR 63.6605(b)]	Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]
405	[40 CFR 63.6625(e)]	Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written
	•	instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner
		consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]
406	[40 CFR 63.6625(f)]	Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]
407	[40 CFR 63.6640(a)]	Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a
		and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ. [40 CFR 63.6640(a)]
408	[40 CFR 63.6640(f)(1)ii]	Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local
		government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing
		1001

to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

### EQT 0288 M-9 - Emergency Diesel Generator for Daphne/Vanessa Sump

417 [LAC 33:III.2111]

409	[40 CFR 63.6640(f)(1)iii]	Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per
410	[40 CFR 63.6655]	year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]  Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information
410	(10 01 11 05:0055)	specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
411	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
412	[LAC 33:III.1311.C]	Which Months: All Year Statistical Basis: None specified  Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60
712	(Line Jaminathe)	consecutive minutes.  Which Months: All Year Statistical Basis: Six-minute average
	0289 E-318 - Predephe [LAC 33:III.501.C.6]	enoling Vent Condenser  Condenser must operate at all times unless the unit is not in operation and the vessels normally vented to the condenser (1) have been emptied of all organic contents and washed or (2) emit only breathing losses which have been included in the permit emissions limits (limited to 10 days per
		year if downstream scrubber is also off).
414	[LAC 33:III.501.C.6]	The condenser is equipped with a high temperature alarm. The maximum temperature of the water supplied to the condenser shall be maintained at 13 degrees Celsius based on a four hour average.
FUG	0001 F-6V - VANESSA	FUGITIVE EMISSIONS
415	[LAC 33:III.2111]	Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
416	[LAC 33:III.5109.A]	Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ for Class I and Class II TAPs with emissions higher than the applicable Minimum Emission Rates (MER). No Class I or Class II TAPs are emitted from this source. MACT is not required.
FUG	0004 F-6C - CATHY FL	JGITIVE EMISSIONS

TPOR0147

Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.

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# FUG 0004 F-6C - CATHY FUGITIVE EMISSIONS

	TOO TOO TOO	30114E EMIGGIONS
418	[LAC 33:III.2122.C.1.c]	Repair according to LAC 33:III.2122.C.3 any regulated component observed leaking by sight, sound, or smell, regardless of the leak's concentration, except those covered under LAC 33:III.2122.C.1.d.
419	[LAC 33:III.2122.C.1.d]	Pumps and valves in heavy liquid service: VOC, Total monitored by 40 CFR 60. Appendix A. Method 21 within 5 days if absenced leaking by
		sight, sound, or smell. Repair according to LAC 33:III.2122.C.3 if the pump or valve is determined to be leaking in excess of the applicable limits given in LAC 33:III.2122.
		Which Months: All Year Statistical Basis: None specified
420	[LAC 33:III.2122.C.2]	Do not locate any valve, except safety pressure relief valves, at the end of a pipe or line containing volatile organic compounds upless the end of
	•	such this is scaled with a second valve, a blind Hange, a bling or a can. Remove such scaling devices only when the line is in you for a can.
		which a sample is being taken. When the line has been used and is subsequently resealed, close the unstream valve first, followed by the sealing
421	[LAC 33:III.2122.C.3]	device.
422	•	Make every reasonable effort to repair a leaking component, as described in LAC 33:III.2122, within 15 days, except as provided.
	<u>.</u>	Determine the percent of leaking components at a process unit for a test period using the equation in LAC 33:III.2122.C.4.
423	[LAC 33:111.2122.C.5]	Determine the total percent of leaking and unrepairable components using the equation in LAC 33:HI.2122.C.5
424	[LAC 33:III.2122.D.1.a]	Process drains: VOC, Total monitored by 40 CFR 60, Appendix A. Method 21 annually (one time per year). If a reading of 1,000 provides
		greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33-HI 2122 C 3
425	[LAC 33:III.2122.D.1.b.i]	which Months: All Year Statistical Basis: None specified
723	[LAC 33.111.2122.13.1.0.1]	Compressor seals: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000 ppmv or
		greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.  Which Months: All Year Statistical Basis: None specified
426	[LAC 33:III.2122.D.1.b.ii]	Pressure relief values in the service: VOC Total maniform land OFF CO. A V A. C V
		Pressure relief valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.
		Which Months: All Year Statistical Basis: None specified
427	[LAC 33:III.2122.D.1.b.iii]	Valves in light liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000
		ppmv or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may
		elect to comply with the alternate standards for valves in LAC 33:III,2122.E (skip period provisions)
400	IT A CLASS TO CLASS TO LA CO	Which Months: All Year Statistical Basis: None specified
428	[LAC 33:III.2122.D.1.b.iv]	Pumps in light liquid service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 5,000
	•	ppiny of greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33-HI 2122 C 3
479	[LAC 33:IH.2122.D.1.b.v]	which Months: All Year Statistical Basis: None specified
147	[24.00 35.111,2122,15,1,0,1]	Valves in gas service: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 quarterly (four times a year). If a reading of 1,000 ppmv
		or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3. Permittee may elect to comply with the alternate standards for valves in LAC 33:III.2122.E (skip period provisions).
		Which Months: All Year Statistical Basis: None specified
430	[LAC 33:III.2122.D.1.c]	Pumps: Seal or closure mechanism monitored by visual inspection/determination weekly (52 times a year).
	-	Which Months: All Year Statistical Basis: None specified
431	[LAC 33:III.2122.D.1.d.i]	Flanged connectors: Presence of a leak monitored by visual, audible, and/or olfactory weekly.
	•	Which Months: All Year Statistical Basis: None specified

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

FUG 0004	F-6C - CATHY	<b>FUGITIVE</b>	<b>EMISSIONS</b>
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432	[LAC 33:III.2122.D.1.e]	Instrumentation systems: Presence of a leak monitored by visual, audible, and/or olfactory weekly.  Which Months: All Year Statistical Basis: None specified
433	[LAC 33:III.2122.D.3.a]	Pressure relief valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 within 24 hours after venting to the atmosphere. If a reading of 1,000 ppmv or greater (for petroleum refineries, SOCMI, MTBE, and polymer manufacturing industry) or 2,500 ppmv or greater (for
434	[LAC 33:III.2122.D.3.b]	natural gas processing plants) is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in LAC 33:III.2122.C.3.  Which Months: All Year Statistical Basis: None specified  All components: VOC. Total monitored by 40 CFR 60. Appendix A Mathed 21 years each conveyer a feet leak detected by 40 CFR 60.
	[3.10 352.122.5.5.0]	All components: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 upon each occurrence of a leak detected by sight, smell, or sound, unless electing to implement actions as specified in LAC 33:III.2122.C.3.  Which Months: All Year Statistical Basis: None specified
435	[LAC 33:III.2122.D.3.c]	Inaccessible valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 annually (at a minimum).  Which Months: All Year Statistical Basis: None specified
436	[LAC 33:III.2122.D.3.d]	Unsafe-to-monitor valves: VOC, Total monitored by 40 CFR 60, Appendix A, Method 21 upon each occurrence of conditions allowing these valves to be monitored safely.
		Which Months: All Year Statistical Basis: None specified
437	[LAC 33:HI.2122.F.1]	When a component which has a leak that cannot be repaired, as described in LAC 33:III.2122.C, is located, affix to the leaking component a weatherproof and readily visible tag bearing an identification number and the date the leak is located. Remove the tag after the leak has been repaired.
438	[LAC 33:III.2122.F]	Equipment/operational data recordkeeping by survey log upon each occurrence of a leak. Include the leaking component information specified in LAC 33:III.2122.F.2.a through j. Retain the survey log for two years after the latter date specified in LAC 33:III.2122.F.2 and make said log
439	[LAC 33:III.2122.G]	available to DEQ upon request.  Submit report: Due semiannually, by the 31st of January and July, to the Office of Environmental Assessment, Environmental Technology Division. Include the information specified in LAC 33:III.2122.G.1 through 6 for each calendar quarter during the reporting period.

#### FUG 0005 F-6D - DAPHNE FUGITIVE EMISSIONS

440	[LAC 33:JJI.2111]	Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling
441		conditions with mechanical seals or other equivalent equipment.
441	[LAC 33:III.2122]	LAC 33:III.2122 applies only if/when anisole is produced. Rhodia will implement a fugitive monitoring program per LAC 33:III.2122 prior to
		startup of anisole campaign.

# GRP 0006 - Cathy

Group Members: EQT 0100 EQT 0101 EQT 0102 EQT 0103 EQT 0104 EQT 0105 EQT 0106 EQT 0107 EQT 0109 EQT 0110 EQT 0111 EQT 0112 EQT 0113 EQT 0114 EQT 0115 EQT 0116 EQT 0137 EQT 0139 EQT 0239 EQT 0240 EQT 0241 EQT 0242 EQT 0243 EQT 0244 EQT 0245 EQT 0245 EQT 0247 EQT 0248 EQT 0249 EQT 0250 EQT 0251 EQT 0252 EQT 0253 EQT 0254 EQT 0256 FUG 0004 EQT 0080 EQT 0081 EQT 0083 EQT 0084 EQT 0085 EQT 0085 EQT 0085 EQT 0086 EQT 0087 EQT 0090 EQT 0091 EQT 0092 EQT 0095 EQT 0095 EQT 0099 EQT 0076 EQT 0077 EQT 0078 EQT 0079

442	[LAC 33:III.2147.F]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC
		33:III.2147.F.1 through F.4, as applicable.

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# GRP 0014 WWT - EMISSIONS CAP - WW TREATMENT PLANT

Group Members: EQT 0118EQT 0119EQT 0120EQT 0121EQT 0122EQT 0123EQT 0124

443 [LAC 33:III.2153.F.1]

Maintain records to demonstrate that the annual VOC loading in wastewater is less than or equal to 10 Mg (11.03 tons).

# GRP 0022 Fire Pump Diesel Engines - Fire Pump Diesel Engines

Group	Group Members: EQT 0286EQT 0287			
444	[40 CFR 63.6595(a)(1)]	40 CFR 63 Subpart ZZZZ requirements become effective May 3, 2013. [40 CFR 63.6595(a)(1)]		
445	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 500 hours of operation, whichever comes first. Inspect all hoses and belts, and replace as necessary. Subpart ZZZZ. [40 CFR 63.6603(a)] Which Months: All Year Statistical Basis: None specified		
446	[40 CFR 63.6603(a)]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. Subpart ZZZZ. [40 CFR 63.6603(a), 40 CFR 63.6625(h)]		
447	[40 CFR 63.6603(a)]	Equipment/operational data monitored by visual inspection/determination annually or every 1,000 hours of operation, whichever comes first. Inspect air cleaner. Subpart ZZZZ. [40 CFR 63.6603(a)] Which Months: All Year Statistical Basis: None specified		
448	[40 CFR 63.6603(a)]	Change oil and filter every 500 hours of operation or annually, whichever comes first. Subpart ZZZZ. [40 CFR 63.6603(a)]		
449	[40 CFR 63.6605(a)]	Be in compliance with emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ at all times. Subpart ZZZZ. [40 CFR 63.6605(a)]		
450	[40 CFR 63.6605(b)]	Operate and maintain at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6605(b)]		
451	[40 CFR 63.6625(e)]	Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. Subpart ZZZZ. [40 CFR 63.6625(e)]		
452	[40 CFR 63.6625(f)]	Install a non-resettable hour meter. Subpart ZZZZ. [40 CFR 63.6625(f)]		
453	[40 CFR 63.6640(a)]	Demonstrate continuous compliance with each applicable emission limitation and operating limitation in 40 CFR 63 Subpart ZZZZ Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d according to methods specified in 40 CFR 63 Subpart ZZZZ Table 6. Subpart ZZZZ [40 CFR 63.6640(a)]		
454	[40 CFR 63.6640(f)(1)ii]	Operate for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Limit maintenance checks and readiness testing		
		to 100 hours per year. Subpart ZZZZ. [40 CFR 63.6640(f)(1)ii]		

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# GRP 0022 Fire Pump Diesel Engines - Fire Pump Diesel Engines

455	[40 CFR 63.6640(f)(1)iii]	Operate up to 50 hours per year in non-emergency situations, but count those 50 hours towards the 100 hours per year provided for maintenance and testing. Do not use the 50 hours per year for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the emergency engine may be operated for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and
		transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low
		frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. Do not operate for more than 30 minutes prior to the time when the emergency condition is expected to occur, and terminate the engine operation immediately after the facility is notified that the
		emergency condition is no longer imminent. Count the 15 hours per year of demand response operation as part of the 50 hours of operation per
.i		year provided for non-emergency situations. Subpart ZZZZ. [40 CFR 63.6640(f)(1)iii]
456	[40 CFR 63.6655]	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.6655(a) through (f), as applicable. Subpart ZZZZ.
457	[LAC 33:III.1101.B]	Opacity <= 20 percent, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
		Which Months: All Year Statistical Basis: None specified
458	[LAC 33:III.1311.C]	Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
		Which Months: All Year Statistical Basis: Six-minute average

### UNF 0001 - Cathyval Plant

	<del></del>	
459	[40 CFR 60.]	All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
460	[40 CFR 61.145(b)(1)]	Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies.
		Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. [40 CFR 61.145(b)(1)]
461	[40 CFR 61.148]	Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and
		friable or wet-applied and friable after drying. Subpart M.
462	[40 CFR 63.]	All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 8 of 40 CFR 63 Subpart ZZZZ.
463	[40 CFR 68.150]	Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first
		listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and
		format to a central point as specified by EPA prior to June 21, 1999.
464	[40 CFR 68.155]	Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (f).
465	[40 CFR 68.160]	Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the
		registration the information specified in 68.160(b)(1) through (20).
466	[40 CFR 68.165]	Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (14).
467	[40 CFR 68.168]	Submit in the RMP the information provided in 68.42(b) on each accident covered by 68.42(a).
468	[40 CFR 68.175]	Provide in the RMP the information indicated in 68.175(b) through (p).

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Air - Title V Regular Permit Minor Mod

	UNF	0001 - Cathyval F	Plant
	469	[40 CFR 68.180]	Provide in the RMP the emergency response information listed in 68.180(a) through (c).
-	470	[40 CFR 68.185(b)]	Submit in the RMP a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete. [40 CFR 68.185(b)]
•	471.	[40 CFR 68.190(c)]	Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
	472	[40 CFR 68.190]	Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
	473	[40 CFR 68.200]	Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
	474	[40 CFR 68.22]	Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
	475	[40 CFR 68.25]	Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
	476	[40 CFR 68.28]	Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one
			alternative release scenario to represent all flammable substances held in covered processes, as specified in 68.28(b) through (e).
	477	[40 CFR 68.30]	Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
	478	[40 CFR 68.33]	List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
	479	[40 CFR 68.36(b)]	Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
	480	[40 CFR 68.36]	Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the
	481	[40 CFR 68.39]	distance to the endpoint by a factor of two or more.  Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (e) on the
	482	[40 CFR 68.42]	offsite consequence analyses.  Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property
		•	damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (11) for each accidental release.
	483	[40 CFR 68.65(d)(2)]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that equipment complies with recognized and generally accepted good engineering practices. [40 CFR 68.65(d)(2)]
,	484	[40 CFR 68.65(d)(3)]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that existing equipment, designed and
	× .		constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner. [40 CFR 68.65(d)(3)]
	485	[40 CFR 68.65(d)(3)]	Determine that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner. [40 CFR 68.65(d)(3)]
	486	[40 CFR 68.67(e)]	Equipment/operational data recordkeeping by electronic or hard copy continuously. Document the resolution of the recommendations of the team performing the process hazard analysis, and what actions are to be taken. [40 CFR 68.67(e)]

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UNF	0001 - Cathyval Plant	
487	[LAC 33:III.1103]	Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
488	[LAC 33:III.1109.B]	Outdoor burning of waste material or other combustible material is prohibited.
489	[LAC 33:III.1303.B]	Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
490	[LAC 33:III.2113.A]	Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
491	[LAC 33:III.219]	Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
492	[LAC 33:III.2901.D]	Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
493	[LAC 33:III.2901.F]	If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901,G.
494	[LAC 33:III.501.C.1]	Submit permit application: Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33:III. Chapter 5. Submit a timely and complete permit application to the Office of Environmental Services, Air Permits Division as required in accordance with the procedures in LAC 33:III. Chapter 5.
495	[LAC 33:III.507.E.4]	Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
496	[LAC 33:III.5105.A.1]	Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
497	[LAC 33:III.5105.A.2]	Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.
498	[LAC 33:III.5105.A.3]	Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
499	[LAC 33:III.5105.A.4]	Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.
500	[LAC 33:[II.5107.A.1]	Submit Annual Emissions Report: Due annually, by the 30th of April unless otherwise directed by DEQ, to the Office of Environmental Services in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
501	[LAC 33:III.5107.A.3]	Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations"

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Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3 Air - Title V Regular Permit Minor Mod

UNF	0001 - Cathyval Plant	
502	[LAC 33:III.5107.B.1]	Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
503	[LAC 33:III.5107.B.2]	Submit notification: Due to the Office of Environmental Compliance, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.Chapter 51.Table 51.1 or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner
504	[LAC 33:III.5107.B.3]	provided in LAC 33:I.3923.  Submit notification: Due to the Office of Environmental Compliance immediately, but in no case later than 24 hours after any unauthorized
		discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:I.3923.
505	[LAC 33:III.5107.B.4]	Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in
506	[LAC 33:III.5107.B.5]	LAC 33:III.5107.B.4.a.i through viii.  Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
507	[LAC 33:III.5109.B.3]	Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment;
508	[LAC 33:III.5111.A.2.a]	and that emissions would be controlled to a level that is Maximum Achievable Control Technology.  Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D, if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source.
509	[LAC 33:III.5111.A]	Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified.
510	[LAC 33:III.5113.B.1]	Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel.
511	[LAC 33:III.5113.B.2]	Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
512	[LAC 33:III.5113.B.3]	Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of

Page 48 of 50

Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through e.

toxic air pollutants, upon request of the department.

513 [LAC 33:III.5113.B.4]

Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

UNF	0001 - Cathyval Plant	
514	[LAC 33:III.5113.B.5]	Submit certified letter: Due to the Office of Environmental Services before the close of business on the 45th day following the completion of the emission test. Report the determinations of the emission test.
515	[LAC 33:III.5113.B.5]	Analyze samples and determine emissions within 30 days after each emission test has been completed.
516	[LAC 33:III.5113.B.6]	Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEO for a minimum.
517	[LAC 33:III.5113.B.7]	of two years, and make available upon request for inspection by DEQ.  Submit notification: Due to the Office of Environmental Services at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
518	[LAC 33:III.5113.C.1]	Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
519	[LAC 33:III.5113.C.2]	Submit notification in writing: Due to the Office of Environmental Services at least 30 days before a performance evaluation of the monitoring system is to begin.
520	[LAC 33:III.5113.C.3]	Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems.
<sub>.</sub> 521	[LAC 33:III.5113.C.5.a]	Submit report: Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days.
522	[LAC 33:III.5113.C.5.d]	Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS.
523	[LAC 33:III.5113.C.5.e]	Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii, if required to install a CMS.
	[LAC 33:III.5113.C.5]	Submit plan: Due to the Office of Environmental Services within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system.
525		Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
.526	[LAC 33:III.5151.F.1.f]	An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
527	[LAC 33:III.517.A.1]	Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III.Chapter 5 prior to approval by the permitting authority.
528	[LAC 33;III.5609.A.1.b]	Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 5 when the administrative authority declares an Air Pollution Alert.

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Al ID: 1314 - Rhodia Inc Activity Number: PER20120002 Permit Number: 2184-V3

Air - Title V Regular Permit Minor Mod

UNF	0001 - Cathyval Plant	
529	[LAC 33:III.5609.A.3.b]	Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.
530	[LAC 33:III.5609.A]	Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.  Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7.
531	[LAC 33:III.5901.A]	Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
532	[LAC 33:III.5907]	Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
533	[LAC 33:III.913]	Provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of emission limits.
534	[LAC 33:III.919]	Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April to the Office of Environmental Services, for the
		reporting period of the previous calendar year that coincides with period of ownership or operatorship, unless otherwise directed by DEQ. Submit both an emissions inventory and the certification statement required by LAC33:III.919.F.1.c, separately for each AI, in a format specified by DEQ. Include the information specified in LAC 33:III.919.F.1.a - F.1.d.
535	[LAC 33:III.927]	Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.

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March 26, 2012

Mr. Sanford Phillips, Assistant Secretary (Hand Delivered, original + 2 copies)
Office of Environmental Services; Air Permits Division
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, LA 70821-4313

AIR PLANNING SEC.

12 APR -3 PM 2: 23

EPA Region 6 (6PD-R), Certified Mail 7010 1670 0001 8962 9180 1445 Ross Avenue, Ste. 1200 Dallas, TX 75202-2733

Re: Application for Minor Permit Modification to Part 70 Permit

Rhodia, Inc. CATHYVAL Plant Permit No. 2184-V2

AI# 1314

Dear Mr. Phillips,

On 4-25-11, LDEQ issued a Title V Permit Renewal to Rhodia for the CATHYVAL Plant. On 12-8-11, LDEQ issued a variance to allow increased hours of scrubber hot water wash; condition no. 1 of the variance requires that a permit modification application be submitted by 3-30-12 to make the change permanent. The permit modification application is enclosed; it also proposes other minor corrections/updates to the permit.

Rhodia requests that minor permit modification procedures be used. The requested changes do not modify, remove, or add any federally-enforceable applicable requirements nor have any new federally-enforceable requirements become applicable since the last permit modification/ renewal. A draft permit is not included (per LAC 33:III.525.B.2.c) because the requested changes are minor and the overall permit will remain largely unchanged. As required by LAC 33:III.525.B.2.b, by signature below, I certify that the proposed modification meets the criteria in LAC 33:III.525.A.2 for a minor modification.

If you have any questions or require any further information, please call John Richardson at 359-3768 or Julie Sheffield at 359-3432.

Sincerely,

Daniel Tate Plant Manager

File 402.4.2



LOUISIANA DEPARTMENT OF ENVIRON QUALITY PO Box 4311 BATON ROUGE LA 70821-4311

Rhodia Inc CN 1120 Cranbury, NJ 08512 Tel: Help Desk, 1-800-717-8252

Page 1 of 1

Check:

0005001465

Date:

12/27/2011

1002682 / LOUISIANA DEPARTMENT OF ENVIRON

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hodia

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DATE: 12/27/2011

Rhodia Inc CN 1120 Cranbury, NJ 08512

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PAY TO THE ORDER OF LOUISIANA DEPARTMENT OF ENVIRON

EIGHTY-SIX ŐNE THOUSAND EÍGHT HUNDRED

LOUISIANA DEPARTMENT OF ENVIRON

QUALITY PO Box 4311 BATON ROUGE LA 70821-4311

Authorized signature

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Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

#### **LOUISIANA**

#### Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

Facility Name or Process Un	iit Name (if	any)						Process Units	
Rhodia Baton Rouge CATH	Rhodia Baton Rouge CATHYVAL Plant				■ Process Unit-Specif				cific Permit
Agency Interest Number (A					Current	ly Effecti	ve Permit N	lumber(s)	
1314							2184	-V2	
Company - Name of Owner							•		
Rhodia, Inc.									
Company - Name of Operato	or (if differe	ent from Ow	ner)						
Parent Company (if Compan	ny – Name o	of Owner giv	ven ab	ove is a divi	sion)				
The Solvay Group									
Ownership:									
Check the appropriate box.							tata at an		
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#### **Modifications Addressed in Permit Application Forms:**

- Hours of hot water wash are being increased for three scrubbers, EQTs 0076, 0082, and 0094 (EIQs 301, 302, and 304) and the
  hourly emission rates during hot water wash are being lowered for some pollutants. EIQ forms are included for the change in
  emissions.
- Per discussions with LDEQ Emission Inventory and Permit personnel in April 2011 while preparing 2010 ERIC report, emissions of particulate matter should not be speciated into TAP compounds if present. Revised EIQ forms for EQTs 0075, 0110, 0111, 0112, and 0116 (EIQs 203, 311, 312, 313, and 317) are included to make this change.
- EIQ forms are included for 3 engines (EQTs 0286, 0287, and 0288 which are EIQs M-8A, M-8B, and M-9) to provide stack discharge characteristics which were missing on the previously submitted EIQ forms.
- The portable diesel pump for stormwater is being removed from the GC 17 list because it is not required to be listed in the permit.

#### Other Modifications/Corrections:

- To allow the increase in scrubber hot water wash hours, for EQT 0076 (EIQ 301), change SR# 195 as follows: "For up to 70-100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation. STATE ONLY"
- To allow the increase in scrubber hot water wash hours, EQT 0082 (EIQ 302), change SR# 208 as follows: "For up to 16 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation."
- To allow the increase in scrubber hot water wash hours, EQT 0094 (EIQ 304), change SR# 233 as follows: "For up to 16 100 hours per year, if/when scrubber becomes plugged during normal operation, scrubber water temperature will be increased to remove pluggage and restore proper operation. STATE ONLY"
- EQT 0210 "C-440 Solvent 2 Washing Column" was added to the permit with version V1 issued 4-20-07. In a 9-4-07 amendment to permit V1, the name of the source was inexplicably and incorrectly changed from C-440 to C-441 in the Inventory but remained correct as "C-440" but in the Specific Requirements. Then, with the V2 permit issued 4-25-11, both Inventory and Specific Requirements have it incorrectly as "C-441". Please change the name of EQT 0210 back to the correct name "C-440 Solvent 2 Washing Column".
- Please delete SR# 489 for UNF 0001; it is redundant with General Conditions (Part 82, Subpart F).
- Please delete SR# 509 for UNF 0001; this requirement is obsolete (TEDI report).
- Please revise SR# 555 for UNF 0001 to include the new due date of the annual inventory (ERIC) which is April 30th. The appropriate requirement is this item from the Air Requirements Library "Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 30th of April to the Office of Environmental Services, for the reporting period of the previous calendar year that coincides with period of ownership or operatorship, unless otherwise directed by DEQ. Submit both an emissions inventory and the certification statement required by LAC 33:III.919.F.1.c, separately for each AI, in a format specified by DEQ. Include the information specified in LAC 33:III.919.F.1.a through F.1.d. [LAC 33:III.919]"
- Please revise SR #s 258, 261, 413, 459 (for EQTs 0113, 0114, and 0288 and GRP 0022) per the April 2011 revision to LAC 33:III.1101. The correct citation for this equipment is LAC 33:III.1101.B which states "The emission of smoke generated by the burning of fuel or combustion of waste material in a combustion unit, including the incineration of industrial, commercial, institutional and municipal wastes, shall be controlled so that the shade or appearance of the emission is not darker than 20 percent average opacity, except that such emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes."
- Please revise the regulatory citation for SR#s 128, 188, and 249 (for EQTs 0051, 0075, and 0106) to be "LAC 33:III.1311.B" which is more accurate than "LAC 33:III.501.C.6" and is also consistent with SR#s 250, 252, 253, 254, 256, and 264.
- Please revise SR#s 260 and 263 (for EQTs 0113 and 0114) per the November 2011 revision to LAC 33:III.1513. The appropriate requirment for this equipment is this item from the Air Requirements Library "Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions. [LAC 33:III.1513.C]"
- Please revise SR# 130 for EQT 0051 as follows "Scrubber must operate at all times that the baghouse blower is operational"
   The original text was in error because this scrubber controls particulate matter, not organics.

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					☐ PSD ☐ NNSR						
If yes, provide Select one if Previo	de date that the this applicationusly Grandfath	prior applica n is for an exist nered (LAC 33 d (e.g., Small S	application currently tion was submitted: sting facility that does 3:HI.501.B.6) Source Exemption; L	s not have a	n air qu		Yes <b>m</b>	No			
Fee Parame parameter he Industrial C that apply to Primary SIC	ere. <u>per ton dail</u> Category: Ente the facility. CC:	code is based of the code is based of the code of the	on an operational par	ation (SIC) a							
Secondary S	SICC(s):	<u>N/A</u>			_						
			, permit type, produc ude with the applica								
		EXISTING	INCREMENTAL			SURCHAR	<u>GES</u>		TOTAL		
FEE CODE	TYPE	CAPACITY	CAPACITY INCREASE	MULTIP	TER	<u>NSPS</u>	PSD	AIR TOXICS	AMOUNT		
0630		88MMlb	NA NA	1.100111					\$ 1,866.00		
<u> </u>									<u> </u>		

GRAND TOTAL

\$ 1,866.00

area will help to avoid confusion.	space provided to give an explanation of the K	
Minimum minor mod fee applies p	er LAC 33:III.211.B.13.d.	
		tronic Fund Transfer (EFT), please include the submitted in the EFT. If not paying the permit  Total Dollar Amount
6. Key Dates		
Estimated date construction will commer	nce: <u>NA</u> Estimated date ope	ration will commence: NA_
[LAC 33:III.517.D.18] List all other process units at this facility	s application. If none, state "none" in the tab	en submitted, but have not been acted upon by
Process Unit Name	Permit Number	Date Submitted
Sulfuric Acid Plant	08840-00033-V3	December 20, 2011
renewals -	nts – Answer all below for new so No ! or state environmental permits identical to, or tates? (This requirement applies to all individu ! 50% or more in your company, or who partici mit or an ownership interest in the permit.)	of a similar nature to, the permit for which als, partnerships, corporations, or other
Do you owe any outstanding fees or final If yes, explain below. Add rows if necess	-	□ Yes □ No
	ited liability company?	

If yes which additi the E	check the appropriate boxes to indicate the type on the shield is being requested. Give an explanation tonal pages if necessary. If additional pages are use explanation field.	f permit shield being sought. In nof the circumstances that will j	clude the specific regulatory citation(s) for ustify the permit shield request. Attach
Туре	of Permit Shield request (check all that apply):		
	Non-applicability determination for:	Specific Citation(s)	Explanation
	40 CFR 60		
	40 CFR 61		
	40 CFR 63		
ļ.	Prevention of Significant Deterioration		
	Nonattainment New Source Review		
	nterpretation of monitoring, recordkeeping, l/or reporting requirements, and/or means of compliance for:	Specific Citation(s)	Explanation
	40 CFR 60		
	40 CFR 61		
	40 CFR 63		
	Prevention of Significant Deterioration		
	Nonattainment New Source Review		
	State Implementation Plan (SIP) Regulation(s) referenced in 40 CFR 52 Subpart T		

#### 10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application. For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

For corporations only: By signing this form, I certify that, in accordance with the definition of Responsible Official found in LAC 33:III.502, (1) I am a president, secretary, treasurer, or vice-president in charge of a principal business function, or other person who performs similar policy or decision-making functions; or (2) I am a duly authorized representative of such person; am responsible for the overall operation of one or more manufacturing, production, or operating facilities addressed in this permit application; and either the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or the delegation of authority has been approved by LDEQ prior to this certification.\*

CERTIFICATION: I certify, un	nder provision	s in Louisiana an	CERTIF.	ICATION: I certify	that the engir	neering calculations,	
United States law which provide criminal penalties for false					and accurate	to the best of my	
statements, that based on inform				ge.			
reasonable inquiry, the statements			•				
Application for Approval of Emis							
70 Sources, including all attachm			e				
statement above, are true, accurate,	, and complete	•					
a. Responsible Official	<u> </u>		b. Profes	sional Engineer			
Name			Name				
Daniel Tate		•		Julie Baron She	ffield		
Title			Title				
Plant Manager				Environmental C	onsultant		
Company			Company	•			
Rhodia, Inc.				JBS, L.L.C.			
Suite, mail drop, or division		,	Suite, ma	il drop, or division		•"	
Street or P.O. Box		- 12 V	Street or P.O. Box				
PO Box 828			PO Box 828				
City	State	Zip	City		State	Zip	
Baton Rouge	LA	70821		Baton Rouge	LA	70821	
Business phone			Business phone				
(225) 359-3751			(225) 359-3432				
Email Address			Email Address				
Daniel.Tate@ US.RI	HODIA.com		Julie.Sheffield@US.RHODIA.com				
Signature of responsible official (S	See 40 CFR 70	0.2)	Signature of Professional Engineer				
			Julie Baron Sheffield  Date 3-23-12				
Date 3/29/12			Date / 3-23-12				
*Approval of a delegation of author	rity can be rec	uested by	Louisiana Registration No. 24677			24677	
completing a Duly Authorized Rep			MANAGEMENT LOS				
(Form_7218) available on LDEQ's	website at			يَعِينُ أَلَّالًا لَهُ	Ur LOUISTE		
http://www.deq.louisiana.gov/porta	al/tabid/2758/]	Default,aspx				Z	
				JULIE REG.	A. BARON Vo. 24677	منعة المقالمة المعالمة المعالمة المعالمة المعالمة المعالمة المعالمة المعالمة المعالمة المعالمة المعالمة المعالمة	

11. Personnel [LAC 33:III.517.D.1]

a. Manage	Manager of Facility who is located at plant site				b. On-site contact regarding air pollution control			
Name			Primary Contact	Name			Primary Contact	
	Daniel Tate				John Richardson			
Title		***		Title				
	Plant Manager				Environmental Ma	nager		
Company				Company				
	Rhodia, Inc.				Rhodia, Inc.			
Suite, mail	drop, or division			Suite, mail	drop, or division			
Street or P.	O. Box			Street or P	.O. Box			
	PO Box 828				PO Box 828			
City		State	Zip	City		State	Zip	
·	Baton Rouge	LA	70821		Baton Rouge	LA	70821	
Business p	hone			Business p	hone			
	(225) 359-3751				(225) 359-3768			
Email Add	ress			Email Add	lress			
	Daniel.Tate@ US.RI	HODIA.com			<u>John.Richardson@</u>	OUS RHODI	A.com	
					:			
c. Person t	to contact with written	corresponder	ice	d. Person	who prepared this r	eport		
Name	***		Primary Contact	Name			Primary Contact	
	John Richardson				Julie Sheffield			
Title				Title				
1,1010	Environmental Man	ager		Environmental Consultant				
Company				Company				
	Rhodia, Inc.			JBS, LLC				
Suite, mail	drop, or division			Suite, mail drop, or division				
<b>~~~~</b>	Τ,							
Street or P	.O. Box			Street or P.O. Box				
501000 CI X	PO Box 828				PO Box 828			
City	. •	State	Zip	City		State	Zip	
·	Baton Rouge	LA	70821		Baton Rouge	LA	70821	
Business p				Business	phone			
_ usinitas F	(225) 359-3768			(225) 359-3432				
Email Add				Email Address				
Lilluit 1144	John.Richardson@	US RHODIA.co	nm	Julie.Sheffield@US.RHODIA.com				
<del></del> -	JOHN: MCHAIGSONG	00,,,,,,00,,,,,,,,,						
e. Person	to contact about Annu	al Maintenand	ce Fees					
Name				Street or I	P.O. Box			
	John Richardson				PO Box 828			
Title				City		State	Zip	
- 1014	Environmental Mar	nager		1	Baton Rouge	LA	70821	
Company		<u> </u>		Business	phone			
Company	Rhodia, Inc.				(225) 359-3768			
Suite mail	l drop, or division			Email Ad	dress			
Juic, man					John.Richardson	@US.RHOD	IA.com	

12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)
PM <sub>10</sub>	1.99
SO <sub>2</sub>	0.16
NOx	6.19
CO	3.98
VOC Total	27.49
Ethyl Chloride	0.12
Hydroquinone	0.09
Methanol	3.38
Methyl Chloride	0.23
Methyl Isobutyl Ketone	9.45
Phenol	0.39
Pyrocatechol	0.21

#### 13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.
- · All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
2184-V0	August 15, 2005
2184-V1 (permit mod)	April 20, 2007
2184-V1 (amended permit)	September 4, 2007
2184-V2 (renewal)	April 25, 2011

2184-V0	Adgust 10, 2000
2184-V1 (permit mod)	April 20, 2007
2184-V1 (amended permit)	September 4, 2007
2184-V2 (renewal)	April 25, 2011
2104 12 (10101141)	

14.a. Enforcement Actions [LAC 33:III.517.D.18] -☐ Yes If yes, list all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility and/or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit. For each action, list the type of action (or its tracking number), the regulatory authority or authorities that issued the action, and the date that the action was issued. Summarize the conditions imposed by the enforcement action, settlement agreement, and consent decree in Section 23, Table 2. It is not necessary to submit a copy of the referenced action. Add rows to table as necessary.

Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?			
VI 21WOLEGE			☐ Yes ☐ No			

14.b. Schedule for If the facility or process description of how compinstructions.	unit for wh	ich application	n is being made is n	ot in fi	ıll compliance	with all app	No licable s as nec	regulations cessary. Sec	i, give e e	a
15. Letters of Ap If yes, list all correspon of compliance with any issuance of the letter an table. Letters that are r	dence with I applicable r d the regula	LDEQ, EPA, or regulations for tion referenced	r other regulatory be this facility or proced by the letter. Atta	odies t ess uni ch as :	hat provides f it (for process an appendix :	for or support unit-specific a copy of all	permit docum	is). List the i <mark>ents refere</mark>	date of	I
Date Letter Iss	ued	Issuing	g Authority		Referenced F	Regulation(s)		Copy of Letter Attached?		
none since last perm	it issued							☐ Yes		No
								☐ Yes		No
Permit in order to satist been satisfied should be should also be properly Initial Notific	If yes, list any initial notifications that have been submitted or one-time performance tests that have been performed for this facility or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit in order to satisfy regulatory requirements. Any initial notification or one-time performance test requirements that have not been satisfied should be listed in Section 23, Table 2 of this application. Any notifications or performance tests that recur periodically should also be properly noted in Section 23, Table 2 of this application. Add rows to table as necessary.  Initial Notification or  Date									not odically
One-time Perfor	mance Test	? Regula	atory Citation Sati	stied	Applicable	Source(s)		ompleted/A	rpprov	/eu
			<u> </u>		***			· · · · · · · · · · · · · · · · · · ·		
17. Existing Prevention of Significant Deterioration or Nonattainment New Source Review  Limitations [LAC 33:III.517.D.18]  Do one or more emissions sources represented in this permit application currently operate under one or more NSR permits?  Yes ■ No  If "yes," summarize the limitations from such permit(s) in the following table. Add rows to table as necessary. Be sure to note any annual emissions limitations from such permit(s) in Sections 13 and 14 of this application.										
	Data Jasuad	Emission	Pollutant	BA	CT/LAER Limit <sup>1</sup>	Averaging Period		escription ( hnology/W Standa	ork Pr	

<sup>1</sup>For example, lb/MM Btu, ppmvd @ 15% O2, lb/ton, lb/hr

18	Air Qualify	Dispersion	Modeling	<b>ILAC 33</b> :	:III.517.D.15	7
IO.	As Quality	Dighelaton	Modeling		**********	1

Was Air Quality Dispersion Modeling as required by LAC 33:III performed in support of this permit application? (Air Quality
Dispersion Modeling is only required when applying for PSD permits and as requested by LDEQ.)
☐ Yes ■ No
Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of a air permit application previously submitted for this facility or process unit (for process unit-specific permits) or as required by other regulations AND approved by LDEQ?
■ Yes □ No
If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:
March 2005 for MIBK

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Standard or (National Ambient Air Quality Standard {NAAQS})
MIBK	8-hour	323 µg/m³	4880 μg/m <sup>3</sup>
			·

#### 19. General Condition XVII Activities -

¥ Yes □ No

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- Expand this table as necessary to include all such activities.
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.

				Emi	ssion I	Rates –	TPY	
Work Activity	Schedule	$PM_{10}$	$SO_2$	NO <sub>x</sub>	CO	voc	C	)ther
Note: Edits from current GCXVII List sha	ded gray.							
							PC	<0.01
Collecting process samples for quality							HQ	<0.01
assurance. Collected in 4-oz bottles.							phenol	<0.01
Assume a max of 1% emitted to the	220 samples per week					0.01	MeOH	<0.01 <0.01
atmosphere.							EtCl	<0.01
							MeCl	<0.01
Drum loading, unloading, and heating	SEE SECTION CONTRACTOR					0.22		
Phenol melting						0.02	phenol	0.02
Maintenance Activities, including: Opening/removing							PC	0.03
pumps, compressors, instruments, valves, vents, and							HQ	0.03
piping; Vessel/equipment/tank truck/ISO container/rail car openings; Filter and strainer change-outs;							phenol	0.03
Miscellaneous equipment cleaning; Nitrogen/steam/air		1				0.25	MIBK	0.03
clearing of equipment and lines; Waste handling/re-			ŀ				МеОН	0.03
packaging							EtCI	0.03 0.03
		ļ					MeCl PC	0.03
Temporary storage of materials in tank						0.05	HQ	<0.03
trucks or ISO containers					descriptions		110	
Portable Diesel Water Pump(s)								
Fugitive dust		0.05	 					
Tote Loading of o-Vanillin						0.07		

#### 20. Insignificant Activities [LAC 33:III.501.B.5]

Yes □ No

Enter all activities that qualify as Insignificant Activities.

- · Expand this table as necessary to include all such activities.
- For sources claimed to be insignificant based on size or emission rate (LAC 33:III.501.B.5.A), information must be supplied to verify each claim. This may include but is not limited to operating hours, volumes, and heat input ratings.
- If aggregate emissions from all similar pieces of equipment (i.e. all LAC 33:III.501.B.5.A.1 activities) claimed to be insignificant are greater than 5 tons per year for any pollutant, then the activities can not be claimed as insignificant and must be represented as permitted emission sources. Consult instructions.

Emission Point ID	Description	Physical/Operating Data	Citation
No.	Description	I hysical operating Data	
	s from current permit shaded gray. Caust		is list because they need 🦠
	uded in a permit application per LAC 33:Ill	.501.B.5.B.	
ID No.	Description	Physical/Operating Data	Citation
	Defoamer for Tars Process	55 gallon drums	LAC 33:III.501.B.5.A.2
	Defoamer for WWTU	55 gallon drums	LAC 33:III.501.B.5.A.2
	Polymer for WWTU - Vulcan 4864	250 gallon totes	LAC 33:III.501.B.5.A.2
D-309X	Clarifier Polymer Feed Tank	1050 gallons	LAC 33:III.501.B.5.A.3
D-407X	Filter Polymer Feed Tank	1690 gallons	LAC 33:III.501.B.5.A.3
D-317X	Polymer Makeup Tank	880 gallons	LAC 33:III.501.B.5.A.3
D-320	Clarifier Floating Layer Tank	750 gallons	LAC 33:III.501.B.5.A.3
D-323	Clarifier Underflow Tank	3170 gallons	LAC 33:III.501.B.5.A.3
D-316	Effluent Pump Tank	4300 gallons	LAC 33:III.501.B.5.A.3
D-420	Filtrate Tank	1260 gallons	LAC 33:III.501.B.5.A.3
C-104	Perchloric Acid Tank, P&ID F103	Vents to Y-132	LAC 33:III.501.B.5.A.4
D-101	H₂O₂ Tank P&ID F102	Vents to Y-120V	LAC 33:III.501.B.5.A.4
D-102	H₂O₂ Tank P&ID F102	Vents to Y-121V	LAC 33:III.501.B.5.A.4
D-106	Polyphosphoric Acid Tank, P&ID F103	Vents to Y-136	LAC 33:III.501.B.5.A.4
D-605	Metabisulfate Injection Tank, P&ID F601	Vents to atmosphere	LAC 33:III.501.B.5.A.4
D-664	Oxalic Acid Injection Drum	Vents to atmosphere	LAC 33:III.501.B.5.A.4
	4 Laboratory Vents	NA	LAC 33:III.501.B.5.A.6
	Analyzer Vents	NA	LAC 33:III.501.B.5.A.9
D-186	Vanessa Caustic Storage	<del>100,900 g</del> allons	LAC 33:III.501.B.5.B.40
D 305	Cathy Caustic Storage, P&ID F-302	1200 gallons	LAC 33:III.501.B.5.B.40
C-210	Daphne Caustic Storage	1200 gallons	LAC-33:III.501;B:5.B:40
C-243	Sulfuric Acid Dilution Tank	958 gallons	LAC 33:III.501.B.5.D

# 21. Regulatory Applicability for Commonly Applicable Regulations — Answer all below [LAC 33:III.517.D.10] Does this facility contain asbestos or asbestos containing materials? Yes No If "yes," the facility or any portion thereof may be subject to 40 CFR 61, Subpart M, LAC 33:III.Chapter 27, and/or LAC 33:III.5151 and this application must address compliance as stated in Section 23 of this application. Is the facility or process unit represented in this permit subject to 40 CFR 68, or is any other process unit located at same facility as the process unit represented in this application subject to 40 CFR 68? Yes No

If "yes," the entire facility is subject to 40 CFR 68 and LAC 33:III. Chapter 59 and this application must address compliance as stated in Section 23 of this application.

Table 5 Yes \[ \] No
Table 6 Tes No
Table 7 Yes No
Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds of refrigerant at this facility or process unit?  Yes No  If "yes," the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of this application.
<ul> <li>22. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping</li> <li>Important points for Table 1 [LAC 33:III.517.D.10]:</li> <li>List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.</li> <li>Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.</li> <li>For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular emission.</li> <li>Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC 33:III.2103 – Storage of Volatile Organic Compounds would never apply to a steam generating boiler, no matter the circumstances.</li> </ul>
• Consult instructions.
Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:  • For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been fulfilled.
<ul> <li>Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.</li> <li>For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be employed. It is not sufficient to state that all compliance options will be employed, though multiple compliance options may be approved as alternative operating scenarios.</li> <li>Consult instructions.</li> </ul>
<ul> <li>Important points for Table 3 [LAC 33:III.517.D.16]:</li> <li>Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the exemption or non-applicability status of the regulation to that source.</li> <li>Fill in all requested information in the table.</li> <li>The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into the Citation Providing for Exemption or Non-applicability column.</li> <li>Consult Instructions.</li> </ul>
<ul> <li>Important points for Table 4 [LAC 33:III.517.D.18]</li> <li>List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does no route its emissions in this manner.</li> <li>List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise appear in this permit application.</li> </ul>

Consult instructions.

Is the facility listed in LAC 33:III.5611

Table 5

Note: Tables 1-4 are not included. There are no changes to applicable requirements.

#### 23. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:III.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common emissions point. Note any emissions sources that route to this common point in Table 4 of the application.
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
  - 1. Sources that combust multiple fuels
- 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or
- 1. Equipment leaks.
- 2. Non-equipment leaks (i.e. road dust, settling ponds, etc).

#### For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form. http://www.deq.louisiana.gov/portal/DIVISIONS/AirPermits/AirPermitApplications.aspx

#### 24. NSR Applicability Summary [LAC 33:III.504 and LAC 33:III.509]

■ N/A

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC 33:III.504 or in LAC 33:III.509) proposing to permit a physical change or change in the method of operation. It would also apply to existing minor stationary sources proposing a physical change or change in the method of operation where the change would be a major source in and of itself. Add rows to each table as necessary. Provide a written explanation of the information summarized in these tables. Consult instructions.

		·			State of	Louisiana	1						Date of Sub	mittal
			Emissions	Inventory	Questi	onnaire (E	IQ) f	or Air Po	lutants				February 2	2012
Emission Point ID No. (Alternate ID)		Descriptiv	e Name of the En	nissions Sou	rce (Alt. N	lame)			Approximate Loc		of Stack or	Vent (see in	•	
203	N.	E	Baghouse for H	IQ/PC Har	ndling				No. 15 Horizontal	673		Datum Vertical	3,376,8	
TEMPO Subject Item ID N EQT0075	NO.		J	•	Ū			Latitude Longitude	30 degrees -91 degrees		min 42 min 27		hundredths hundredths	
	ameter or k Discharge Area	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Condition	ons, Sta	ack Gas Exit emperature	Ope	Normal rating Time	Date of Construction			This Emis	Throughput	,
Change? No	0.50 ft ft²	60 ft	37.0 ft/sec		1	NA °F	(riou	rs per year) 1000	After 1988		Jan - Mar 25%	Apr - Jun 25%	Jul - Sep 25%	Oct - Dec 25%
Type of Fuel Use	ed and Heat	Input (see instruc	tions)					Operatin	g Parameters (inlu	ıde ur	nits)	<u> </u>		
Fuel Type of Fue	~~~~~		(MM Btu/hr)					Value/Parameter					tion	•
a NA b c				Maximum O Design Cap	Normal Operating Rate/Throughput NA Maximum Operating Rate/Throughput Design Capacity/Volume									
	Notes			Shell Height (ft) Tank Diameter (ft)										
					○ Fixe	ed Roof	Float	ing Roof	External Flo	oating	Roof O	Internal Flo	ating Roof	
Emission Point ID No.				Air Poll	utant Sr	ecific Info	rmati	on						
(Alternate ID)			<u> </u>		ed Emissi			Parmitted Add Change Centinuous						
203 Pollutant	Equip	ntrol Control oment Equipment ode Efficiency	HAP/TAP CAS Number	Average (lb/hr)	Maximun (lb/hr)	Annual (tons/yr)	Emi	ission Rate (tons/yr)	Delete, or Unchanged	Co	onunuous ompliance Method	Concentra	tion in Gase Stack	s Exiting at
PM10	<u> </u>	17 98%		0.04	0.09	0.02	-	0.02	U	<u> </u>				
SO <sub>2</sub>	<del>-                                     </del>	11 3070		0.04	0.00	0.02	├─	0.02		<del>                                     </del>				
NOx						-	├							
СО														
VOC Total														
Hydroquinone									D					
Pyrocatechol								·	D					
							l							
				ļ						<u> </u>				
					<u> </u>									
							<del> </del>	· · · · · · · · · · · · · · · · · · ·						
					<u> </u>							-	· · · · · · · · · · · · · · · · · · ·	
			-				<del> </del>					<u> </u>		

		•	·			Date of Sul	omittal											
				<b>Emissions</b>	Inventory	Quest	ionnaire (E	IQ) f	or Air Po	llutants				February	2012			
Emission Point ID			Descriptiv	e Name of the Er	nissions So	urce (Alt.	Name)			Approximate Loc	cation	of Stack or	Vent (see	instructions)				
301 TEMPO Subject Iten	a ID No	Ph	enolic Rea	actor Vent Scr	ubber C-2	209 (P&I	I.D. F201)		Method UTM Zone Latitude	No. 15 Horizontal 30 degrees	673		Datu Vertic sec 8					
EQT0076												min 29		18 hundredths				
Stack and Discharge Physical Characteristics	Diameter o Stack Discha Area	rge Heig	iht of Stack ove Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Si	tack Gas Exit Femperature	Ope	Normal rating Time rs per year)	Date of Construe or Modification	iction		This En	i Throughput nission Point n Jul - Sep	through Oct - Dec			
Change? No	0.25 ft ft <sup>2</sup>		35 ft	9.45 ft/sec	28	ft³/min	Ambient °F	Ì	8760	After 1989		25%	25%	25%	25%			
	el Used and H	leat Input	(see instruct	tions)					Operatin	g Parameters (inlu	ide un	its)	·					
Fuel Type o	of Fuel		Heat Input (	(MM Btu/hr)		Value/Parameter							Description					
a Na b c	A				Maximum ( Design Car	Jormal Operating Rate/Throughput NA  Maximum Operating Rate/Throughput Design Capacity/Volume												
	No	otes			Shell Heigh	nt (ft)												
					Tank Diam	ank Diameter (ft)												
						○ Fix	ed Roof O	Float	ing Roof	External Flo	pating	Roof O	Internal F	loating Roof				
Emission Point ID	No.				Air Pol	lutant S	pecific Infor	mati	on									
(Alternate ID)	) [	041	0		Propos	ed Emiss	ion Rates		ermitted	Add, Change, Continuous								
301	E	Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Average (lb/hr)	Maximui (lb/hr)		Emi	ssion Rate tons/yr)	Delete, or Unchanged	Co	mpliance Method	Concent	ration in Gase Stack	es Exiting at			
Pollutant			,		(18/111)	(10/11/	((0/13/3/)	'	(0113/31)	Ononangea		victitou						
PM10						<u> </u>		<u> </u>		<u>.</u>								
SO <sub>2</sub>						ļ												
NOx CO																		
VOC Total		001	>95		0.04	4.44	0.00	<u> </u>										
Hydroquinone		001	>95 ≥53	123-31-9	0.01 <0.001	1.11 0.01	0.06 <0.01		0.19	C								
Phenol	<del></del>	001	≥98	108-95-2	0.001	1.00	0.05		0.003	C								
Pyrocatecho	<del>i                                    </del>	001	≥99.9	120-80-9	0.002	0.10	0.01	<u> </u>	0.02	C								
			-00.0	12000	0.002	0.70			0.02	Ŭ								
									····									
							<u> </u>	ļ										
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			State of Louisiana Emissions Inventory Questionnaire (EIQ) for Air Pollutants												mittal
				Emissions i	inventory	Questi	ionnaire (E	IQ) f	or Air Po	llutants				February 2	2012
Emission Point II (Alternate ID			Descriptive	e Name of the En	nissions Sou	ırce (Alt. I	Name)			Approximate Loc		of Stack or	Vent (see in	•	
302 TEMPO Subject Iter EQT0082			Tank F	arm Scrubber	C-319 (P	&I.D. F′	107)		Method UTM Zone Latitude Longitude	30 degrees	673 30	min 39			
Stack and Discharge Physical Characteristics	Diameter of Stack Dischar	arnel He	eight of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi	ons, Si	ack Gas Exit emperature	Ope	Normal rating Time rs per year)	Date of Construction		Percen Jan - Mar		Throughput ssion Point Jul - Sep	through
Change?	0.25 f	t t²	32 ft	20.7 fl/sec			Ambient °F	(NOUI	8760	After 1989		25%	25%	25%	25%
Type of Fu	el Used and l	leat Inp	ut (see instruct	tions)		<u>-</u>			Operatin	g Parameters (inlu	ide ur	its)			
Fuel Type	of Fuel		Heat Input (	(MM Btu/hr)		·			Value	e/Parameter		Description			
a N c	IA T				Maximum C	Normal Operating Rate/Throughput NA Maximum Operating Rate/Throughput Design Capacity/Volume									
	N	lotes			Shell Heigh	it (ft)									
					Tank Diameter (ft)										
						○ Fix	ed Roof	Float	ing Roof	External Flo	ating	Roof O	Internal Flo	oating Roof	
Emission Point I	D No.				Air Pollutant Specific Information										
(Alternate ID	)) [*				Propos	ed Emiss	ion Rates		Permitted Add, Change, Continuous						
302 Pollutant		Control Equipme Code		HAP/TAP CAS Number	Average (lb/hr)	Maximu (lb/hr)		Emi	ission Rate (tons/yr)	Delete, or Unchanged	Continuous Compliance Method		Concentra	tion in Gase Stack	s Exiting at
PM <sub>10</sub>								-							
SO <sub>2</sub>							+								
NOx	İ				<u> </u>										
CO												····			
VOC Total		001	≥98		0.20	13.51	0.88		0.24	С					
Phenol		001	≥98	108-95-2	<0.001	0.01	<0.01	L	0.02	С					
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							<u> </u>	<del> </del>							* * *
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						<del>                                     </del>					<del> </del>				

			•			State of	Louisiana	1						Date of Sub	mittal	
				Emissions I	Inventory	Questi	onnaire (E	IQ) f	or Air Po	llutants				February :	2012	
Emission Point II (Alternate ID			Descriptive	e Name of the En	nissions Sou	ırce (Alt. N	lame)			Approximate Loc		of Stack or	Vent (see in			
304			PC Flaker	· Vent Scrubbe	er C-561 (	חגור	F508)			N/ 15 Horizontal	673		_ Datum Vertical	3,376,8		
TEMPO Subject Iter EQT0094	1		. OT lake	Vent Corabb	Si O 001 (	,	1 000,		Latitude Longitude	30 degrees -91 degrees				hundredths hundredths		
Stack and Discharge Physical Characteristics	Diameter Stack Disch Area	ame It	Height of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Sta	ack Gas Exit emperature	Ope	Normal rating Time	Date of Construe or Modificatio			This Emis	Throughput	_	
Characteristics Change? No	0.25 f	t t²	35 ft	2.7 ft/sec			mbient °F	(nou	rs per year) 8760	After 1989		Jan - Mar 25%	Apr - Jun 25%	Jul - Sep 25%	Oct - Dec 25%	
			put (see instruct	ions)				<u> </u>	Operatin	g Parameters (inlu	ide ur	l nits)	1	<u></u>		
	of Fuel		Heat Input (							e/Parameter			Description			
a N b c	IA				Maximum ( Design Car	Operating loacity/Volu	te/Throughpu Rate/Through me		NA							
	١	lotes			Shell Heigh											
					Tank Diam				<u> </u>							
									ing Roof	O External Flo	pating	Roof (	Internal Flo	ating Roof		
Emission Point II	L-						pecific Info	rmati	on							
(Alternate ID	))	Contro	ol Control		Propos	ed Emissi	on Rates	l p	Permitted Add, Change, Continuous							
304		Equipm Code	nent Equipment	HAP/TAP CAS Number	Average (lb/hr)	Maximur (lb/hr)	n Annual (tons/yr)	Emi	ssion Rate tons/yr)	Delete, or Unchanged	Co	mpliance Method	Concentra	tion in Gase Stack	s Exiting at	
Pollutant PM1 o				,	<u> </u>		<del>-</del>	-								
SO <sub>2</sub>								<del> </del>		***************************************			<u> </u>			
NOx					<u> </u>			<del> </del>								
CO																
VOC Total		001			0.01	0.30	0.06		0.05	С						
Pyrocatecho	ol l	001	≥98	120-80-9	0.01	0.30	0.06	└	0.05	С						
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			:				Date of Sub	mittal								
				Emissions	Inventory	/ Quest	ionnaire (E	IQ) f	or Air Po	llutants				February :	2012	
Emission Point II (Alternate ID			Descriptiv	e Name of the Er				-		Approximate Loc	cation	of Stack or	Vent (see i	nstructions)		
311									Method UTM Zone		/A 673	,550 mE	. Datum Vertica		0 83 06 mN	
TEMPO Subject Iter			PC Pack	aging Baghou	se Y-731	(P&I.D.	F703)		Latitude	30 degrees	30	min 42	sec 98	hundredths hundredths		
EQT0110	,													-		
Stack and Discharge Physical Characteristics	Diameter Stack Disch Area	erne He	eight of Stack Above Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, S	tack Gas Exit Femperature	Ope	Normal rating Time	Date of Constru or Modification			This Emi	Throughput		
Change?	0.50 1	ft ft²	59 ft	42.5 ft/sec			Ambient °F	(nou	rs per year) 8760	After 1989		Jan - Mar 25%	Apr - Jun 25%	Jul - Sep 25%	Oct - Dec 25%	
			ut (see instruc	tions)				<u> </u>	Oneratin	g Parameters (inl	ıde ur	l vite)	<u> </u>			
	of Fuel	110011111111111111111111111111111111111	Heat Input						Operating Parameters (inlude units)  Value/Parameter				Description			
	IA .				Maximum ( Design Car	ormal Operating Rate/Throughput NA aximum Operating Rate/Throughput esign Capacity/Volume										
		Votes			4 -	hell Height (ft) ank Diameter (ft)										
						O Fix	ced Roof	Float	ing Roof	O External Flo	oating	Roof O	Internal Fl	oating Roof		
Emission Point II					Air Pol	llutant S	pecific Infor	mati	on							
(Alternate ID	))	Control	Control		Propos	ed Emiss	ion Rates	Ь	Permitted Add, Change, Continuous							
311		Equipmer Code		HAP/TAP CAS Number	Average (lb/hr)	Maximu (lb/hr)		Emi	ssion Rate tons/yr)	Delete, or Unchanged	Continuous Compliance Method		Concentra	ition in Gase Stack	s Exiting at	
Pollutant PM10		017	98%		0.05	0.10	0.22	·	0.22	U						
SO <sub>2</sub>		011	90.70	<del></del>	0.03	0.10	0.22		0.22	0						
NOx							<del></del>									
CO														<del>.</del>		
VOC Total		ï														
Pyrocatecho	ol									D						
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				<del></del>												
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			·	State of Louisiana Emissions Inventory Questionnaire (EIQ) for Air Pollutants													
				<b>Emissions</b>	Inventory	Questi	onnaire (E	IQ) f	or Air Po	llutants				February	2012		
Emission Point II (Alternate ID			Descriptiv	e Name of the Er				-		Approximate Loc	cation	of Stack or	Vent (see i	nstructions)			
312 TEMPO Subject Iter			HQ Pack	aging Baghou	se Y-716	(P&I.D. I	F703)		Method UTM Zone Latitude Longitude	15 Horizontal 30 degrees	30	min 42					
EQT0111 Stack and Discharge	Diameter		ght of Stack	Stack Exit	Stack Gas	I Sta	ack Gas Exit		Vormal	Date of Construc			t of Annual	- Throughput			
Physical Characteristics	Stack Disch Area	amei	ove Grade	Velocity	at Conditi not at Star	ons,   🖵	emperature		rating Time rs per year)	or Modification		Jan - Mar		ssion Point Jul - Sep	Oct - Dec		
Change? No	0.50 f	ft ft²	59 ft	42.5 ft/sec	500	ft³/min A	mbient °F		8760	After 1989		25%	25%	25%	25%		
Type of Fue	el Used and I	Heat Input	t (see instruc	tions)					Operatin	g Parameters (inlu	ide un	its)					
Fuel Type of			Heat Input						Value/Parameter					Description			
a N b					Maximum (	ormal Operating Rate/Throughput NA aximum Operating Rate/Throughput esign Capacity/Volume											
		Votes			Shell Heigh	ıt (ft)											
					Tank Diam	eter (ft)											
						O Fixe	ed Roof	Floati	ng Roof	O External Flo	ating	Roof O	Internal Fl	oating Roof	******		
Emission Point II	O No.	· · · · · · · · · · · · · · · · · · ·			Air Pol	lutant Sr	ecific Infor			•							
(Alternate ID	) [	•	1			ed Emissi											
312		Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Average (lb/hr)	Maximum (lb/hr)	1	Emi	ermitted ssion Rate tons/yr)	Add, Change, Delete, or Unchanged	Co	ntinuous mpliance /lethod	Concentra	ition in Gase Stack	s Exiting at		
Pollutant PM10		047	000/		, ,	0.40	<u> </u>	`		_							
SO <sub>2</sub>		017	98%		0.05	0.10	0.22		0.22	U							
NOx					<u> </u>								[				
CO	+		-														
VOC Total	-						-										
Hydroquinone	<u> </u>		-				+	-		D							
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		·			State of	Louisiana	1						Date of Sub	mittal
			Emissions !	Inventory	Questi	onnaire (E	IQ) f	or Air Pol	lutants				February :	2012
Emission Point ID No. (Alternate ID)		Descriptiv	e Name of the En	nissions Sou	ırce (Alt. î	Name)			Approximate Loc	ation o	f Stack or	Vent (see i	nstructions)	
313	HQ Re	work Dun	nper Baghouse	s-693 fo	r D607 (	(P&ID F60	12)		N/. 15 Horizontal	673,5		Datum Vertica	3,376,8	
TEMPO Subject Item ID No.  EQT0112			.por = agricuo			(. 32 00		Latitude Longitude	30 degrees -91 degrees	30 r 11 r			hundredths hundredths	
Stack and Discharge Diameter o Physical Stack Dischar	rge Heig	ht of Stack ove Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, St	ack Gas Exit emperature	Oper	Normal rating Time rs per year)	Date of Constructor Modification	n L	Percent Jan - Mar		Throughput ssion Point Jul - Sep	through Oct - Dec
Change? 0.50 ft		59 ft	34.0 ft/sec		ĺ	\mbient °F	(HOGI	8760 After 1989 25%			25%	25%	25%	
Type of Fuel Used and H	leat Input	(see instruc	tions)					Operating Parameters (inlude units)						
Fuel Type of Fuel		Heat Input						Value	/Parameter			Descrip	tion	
a NA b c					Operating	ite/Throughpu Rate/Through ime		NA						
No.	otes			Shell Heigh	it (ft)									
				Tank Diam	eter (ft)									
					○ Fixe	ed Roof O	Floati	ing Roof	<ul><li>External Flo</li></ul>	ating F	Roof O	Internal Flo	oating Roof	
Emission Point ID No.				Air Pollutant Specific Information										
(Alternate ID)				Propos	ed Emiss	ion Rates	1	ermitted	1 d d   0 h =		45			
	Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Average (lb/hr)	Maximur (lb/hr)	n Annual (tons/yr)	Emi	ermitted ssion Rate tons/yr)	Add, Change, Delete, or Unchanged	Con	itinuous ipliance ethod	Concentra	ition in Gase Stack	es Exiting at
Pollutant						` ` `	,							
PM <sub>10</sub>	017	98%		0.01	0.01	0.02		0.02	U					
SO <sub>2</sub> NOx														
CO							-							
VOC Total														
Hydroquinone						-			D					
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			•				State of	Louisiana	·						Date of Sub	mittal
					Emissions 1					or Air Pol	llutante				February	
	Emission Point II	) No		Descriptiv	e Name of the En				102) 1	01 711 1 01			<del></del>			
	(Alternate ID			2000	o ridino di mo Eli			amoj			Approximate Loc	ation	of Stack or	Vent (see i	nstructions)	
	317									Method	N/			Datum		D 83
			Vacuu	ım Clean-U	p Packaging E	Badhouse	Y-760X	(P&I.D. F7)	11.51		15 Horizontal			Vertica		
16	EMPO Subject Iter							(* ****-***		Latitude	30 degrees		min 43		hundredths	
	EQT0116									Longitude	-91 degrees	- 1 1		sec 75	hundredths	
Stac	k and Discharge	Diamete		ight of Stack	Stack Exit	Stack Gas	1 510	ck Gas Exit		Vormal	Date of Construc	tion	Percent	of Annual	Annual Throughput through ils Emission Point	
	Physical	Stack Disc	narge A	bove Grade	Velocity	at Conditi	ons,   Te	emperature		rating Time	or Modificatio		· · · · · · · · · · · · · · · · · · ·			
٦	haracteristics Change?	Area 1.00				not at Star	idard	·	(hour	rs per year)			Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
	No	1.00	ft <sup>2</sup>	60 ft	7.64 ft/sec	360	ft³/min A	mbient °F		8760	1995		25%	25%	25%	25%
		Type of Fuel Used and Heat Input (see instructions)						Operating Parameters (inlude units)								
Fuel	Туре			Heat Input	(MM Btu/hr)						/Parameter			Descrip	tion	
a	N	Α						e/Throughpu		NA						
b			1			1		Rate/Through	put							
С	<u> </u>		Notes			Design Car Shell Heigh		me								
			140.03			Tank Diam										
							O Fixe	d Roof	Floati	ing Roof	O External Flo	ating	Roof O	Internal Fl	pating Roof	
	Emission Point II	O No.				Air Pol	lutant Sc	ecific Infor					,			
	(Alternate ID	)					ed Emission			ermitted	Add, Change,					
	317		Control Equipmen	Control  t Equipment	HAP/TAP CAS					hission Rate Delete, or		Continuous Cor		Concentra	ncentration in Gases Exiting	
	Pollutant		Code	Efficiency	Number	(lb/hr)	(lb/hr)	(tons/yr)		tons/yr)	Unchanged		viethod		Stack	
	PM <sub>10</sub>		017	99.9%		<0.001	0.40	<0.01		<0.01	U					
	SO <sub>2</sub>			05.070		10.001	0.40	10.01		-0.01						
	NOx				***************************************											
	ÇO															
<u> </u>	VOC Total							<u> </u>								
<u> </u>	Hydroquinon										D D					
<del> </del>	Pyrocatecho	/i									D D					
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Emission Point ID No. (Alternate ID)  M-8A  TEMPO Subject Item ID No. EQT 0286  Stack and Discharge Physical Characteristics Change? Yes  Type of Fuel Used and Heat Input (see instructions)  Emissions Inventory Questionnaire (EIQ) for Air Pollutants  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions)  Approximate Location of Stack or Vent (see instructions					<u>:                                      </u>		State of	Louisiana				<u> </u>		Date of Sub	mittal
Emission Point ID No. (Alternate ID) No. (Alternate ID) No.   Pire-Water Pump G972A					Emissions			•	-	r Air Pol	lutante				
M-8A   TEMPO Subject Item ID No.   Fire-Water Pump G972A   Fire-Water Pump G972A   Temporature   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Method   Met	Emission Point II	D No.		Description					10,101	AIII				<u>-</u>	
TEMPO Subject Item ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQT 0286   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   EQUIPMENT   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   Tem ID No.   T	(Alternate ID	<b>)</b> )		,			(	<b>,</b>			Approximate Locat	ion of Stack or	Vent (see ir	structions)	
Latitude	M-8A												•		
Stack and Discharge Physical Characteristics Change? Yes I 10.6 ft 20.4 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/sec 240 ft/se	TEMPO Subject Iter	m ID No.			Fire-Water F	Pump G97	72A								
Stack and Discharge   Physical Characteristics   Change?   Area   0.5 ft   10.6 ft   20.4 ft/sec   240 ft/min   604 °F   100   Departing Parameters (inlude units)															
Physical Characteristics Change? Area Characteristics Change? Yes Piel Used and Heat Input (see instructions)  Type of Fuel Used and Heat Input (see instructions)  Normal Operating Rate/Throughput Design Capacity/Volume  M-8A and M-8B are permitted in emissions cap GRP 0022. This EIQ sheet updates stack characteristics only; there is no change in emissions.  M-8A normal Description  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A  M-8A		<del></del>			1	I 04-41-04					-			•	
Characteristics   Area   Above Grade   Velocity   Not at Standard   Charge   Yes   10.6 ft   10.6 ft   20.4 ft/sec   240 ft/min   604 °F   100   before 2000   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   25%   2			harge Hei		1		ione   Sta					on Percen		• .	through
Change?   10.6 ft   10.6 ft   20.4 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec   240 ft/sec	Characteristics		1	ove Grade	Velocity		1 10	mperature			or Modification	Jan - Mar			Oct - Dec
Type of Fuel Used and Heat Input (see instructions)  Type of Fuel  Type of Fuel  Type of Fuel  Heat Input (MM Btu/hr)  Air Pollutant Specific Information  (Alternate ID)  M-8A  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant	-	0.5	- 1	10.6 ft	20.4 ft/sec	240	ft³/min	604 °F	1	.00	before 2000	25%			
Fuel Type of Fuel Heat Input (MM Btu/hr)  a diesel		l el Used and		(see instruc	tions)								L	25%	2070
A diesel Normal Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Maximum Operating Rate/Throughput Shelf Hap/Tap/Tap/Cap/Shelf Height (ft)    M-8A and M-8B are permitted in emissions cap GRP 0022. This EIQ sheet updates stack characteristics only; there is no change in emissions.   Tisked Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floating Roof Floati									1			e units)	Descript	ion	
Design Capacity/Volume   370 HP, each		sel		•	·								20001170		
Notes   Shell Height (ft)   Tank Diameter (ft)   Tank Diameter (ft)	i l						•	•	put	070					
M-8A and M-8B are permitted in emissions cap GRP 0022. This EIQ sheet updates stack characteristics only; there is no change in emissions.    Fixed Roof   Floating Roof   External Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof   Internal Floating Roof	<u> </u>		Notes					ne		370	HP, each				
updates stack characteristics only; there is no change in emissions.  Emission Point ID No. (Alternate ID)  M-8A  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Nos  NA  NA  NA  NA  NA  NA  NA  NA  NA  N	M-8A and M-8B are no	-			***************************************	1	- •		1						
Emission Point ID No. (Alternate ID)  M-8A  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Add, Change, Continuous Compliance (tons/yr)  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Pollutant  Nad, NA  NA  NA  NA  NA  NA  NA  NA  NA  NA							$-\bigcirc$	O	Flooting	. Doof		O		-ti Df	
Control Equipment Code   Control Efficiency   Code   Control Efficiency   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Cod	Emission Point II	D No		_		Air Bo					External ribat	ing Rooi	internal Fio	ating Root	
M-8A    Control Equipment Code   Control Equipment Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code   Code				T	Proposed Emission Rates							T			
Pollutant         Code         Efficiency         Number         (Ib/hr)         (Ib/hr)         (tons/yr)         Unchanged         Method         Stack           PM₁₀         000         NA         NA         NA         NA         U           SO₂         000         NA         NA         NA         NA         U           NOx         000         NA         NA         NA         NA         U           CO         000         NA         NA         NA         NA         U	М-8Д						1						Concentra	tion in Gase	s Exiting at
PM1 0         000         NA         NA         NA         NA         U           SO 2         000         NA         NA         NA         NA         U           NOX         000         NA         NA         NA         NA         U           CO         000         NA         NA         NA         NA         U					Number	_			i					Stack	
SO2         000         NA         NA         NA         NA         U           NOX         000         NA         NA         NA         NA         U           CO         000         NA         NA         NA         NA         U			000			NA	NA	NA.		VA.	11				
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				<b>Emissions</b>	Inventory	Questi	onnaire (E	IQ) f	or Air Po	lutants				February 2	2012	
Emission Point II (Alternate ID			Descriptiv	e Name of the En	nissions Sot	ırce (Alt. N	Name)			Approximate Loc	ation	of Stack or	Vent (see in	structions)		
M-8B	,								Method	N/			Datum		D 83	
TEMPO Subject Ite	m ID No			Fire-Water F	ump G97	'2B			UTM Zone Latitude	15 Horizontal 30 degrees		,828 mE min 44	Vertical	3,376,9 hundredths		
· ·										-91 degrees			sec 83			
EQT 0287	·	<u> </u>														
Stack and Discharge Physical	Diamete Stack Disc	harne Heig	ht of Stack	Stack Exit	Stack Gas at Conditi	one   St	ack Gas Exit	ŧ	Normal rating Time	Date of Construc	iction   This Em			al Throughput through in insision Point		
Characteristics	Area	- I Δh	ove Grade	Velocity	not at Star		emperature	,	rs per year)	or Modificatio	n	Jan - Mar	Apr - Jun		Oct - Dec	
Change? Yes	0.5	ft ft²	10.6 ft	20.4 ft/sec	240	ft³/min	604 °F		100	before 2000		25%	25%	25%	25%	
		Heat Input	(see instruc			<u> </u>				g Parameters (inlu	de ur	its)				
	uel Type of Fuel Heat Input (MM Btu/hr)						4 - CT1		Value	/Parameter			Descript	ion		
a die b c	esei	***************************************	-			Operating I	ite/Throughput Rate/Through; ime		370	HP, each						
		Notes			Shell Heigh	ıt (ft)										
M-8A and M-8B are pe updates stack cha			•		Tank Diameter (ft)  Fixed Roof Floating Roof External Floating Roof						Internal Fla	ating Doof				
Emission Point I		I			Air Dal		pecific Infor			External Flo	aung	ROOI	Internal Flo	ating Root		
(Alternate IE						ed Emissi	·									
M-8B	•	Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Average	Maximur	n Annual	Emi	ermitted ssion Rate	Add, Change, Delete, or Unchanged	Co	ontinuous mpliance Method	Concentra	tion in Gase Stack	s Exiting at	
Pollutant			Lincicity		(lb/hr)	(lb/hr)		,	tons/yr)			vietnoa				
PM <sub>10</sub> SO <sub>2</sub>		000			NA NA	NA NA	NA NA		NA NA	U						
NOx		000			NA NA	NA NA	NA NA		NA NA	U				·	·	
СО		000			NA	NA	NA		NA	U						
VOC Total		000			NA	NA	NA		NA	U						
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							State of	Louisiana	1					Date of Sub	mittal	
					Emissions I					or Air Pol	lutants			February :	2012	
	Emission Point II (Alternate ID			Descriptiv	e Name of the En						Approximate Loca	tion of Stack or	Vent (see	instructions)		
	M-9	•								Method	N/A		Datur		D 83	
70	EMPO Subject Iter	m ID No	Eme	ergency Di	esel Generato	r for Daph	ne/Vane	essa Sump			15 Horizontal		Vertica			
1 0	_					·		·	1	Latitude Longitude	30 degrees	30 min 40 11 min 25		hundredths hundredths		
	EQT 0288	5	<u> </u>													
	k and Discharge Physical haracteristics	Diamete Stack Disc Area	harge Hei	ght of Stack ove Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Sta	ack Gas Exit emperature	Oper	Normal rating Time	Date of Construct or Modification	ion	This Em	Annual Throughput through This Emission Point		
U	Change? Yes	0.5		11.8 ft	32.0 ft/sec		ft³/min	285 °F	(noui	s per year) 400	before 2000	Jan - Mar 25%	Apr - Jur 25%	Jul - Sep 25%	Oct - Dec 25%	
		el Used and		(see instruc	tions)				l	Operating	Parameters (inlud	e units)				
Fuel	Туре	of Fuel			(MM Btu/hr)						/Parameter		Descri	otion		
a b c	die	sel					Operating F	te/Throughpu Rate/Through me		222 500						
			Notes			Shell Height (ft)										
						Tank Diam										
			1			4: 5	O Fixe			ng Roof	O External Floa	ting Roof O	Internal F	oating Roof		
	Emission Point II (Alternate ID			<del></del>				pecific Infor	matio	on			1		·····	
	M-9	,	Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Average Maximum Annual Em		Emi	ermitted ssion Rate tons/yr)	Add, Change, Delete, or Unchanged	Continuous Compliance Method	Concentr	ation in Gase Stack	s Exiting at		
	Pollutant								'	• .		Wethod				
	PM10 SO2		000	<del> </del>		0.49	0.49 0.46	0.10		0.10	U					
	NOx		000	<u> </u>		0.46 6.88	6.88	1.38		1.38	U					
	CO		000	<del>                                     </del>		1.48	1.48	0.30		0.30	Ü					
	VOC Total		000			0.56	0.56	0.11		0.11	U					
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#### PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	NA	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	•	0	0	••
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	•	0	0	AAE - Section 10
517.B.3 Certification	Does the Application Include Certification by a Professional Engineer or their Designee:	•	0	0	AAE - Section 10
517.D.1 Identifying Information	Does the Application Include:				
	1. Company Name, Physical and Mailing Address of Facility?	•	0	0	AAE - Section 2
	2. Map showing Location of the Facility?	•	0	0	Appendix A
	3. Owner and Operator Names and Agent?	•	0	0	AAE - Section 1
	4. Name and Telephone Number of Plant Manager or Contact?	•	0	0	AAE - Section 11
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	0	0	•	No change from current permit
	Does the Application Include the Source's SIC Code?	•	0	0	AAE - Section 5
	Does the Application Include EPA Source Category of HAPs if applicable?	0	0	•	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	•	0	0	AAE - Section 23
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	0	•	0	No change from current permit
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	•	0	0	AAE - Sections 2, 12, 23
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	•	0	0	Appendix B
517 D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	0	0	•	No change from current permit
517.D.9 Calculations	Are Emission Calculations Provided?	•	0	0	Appendix B
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	0	0	•	No change from current permit

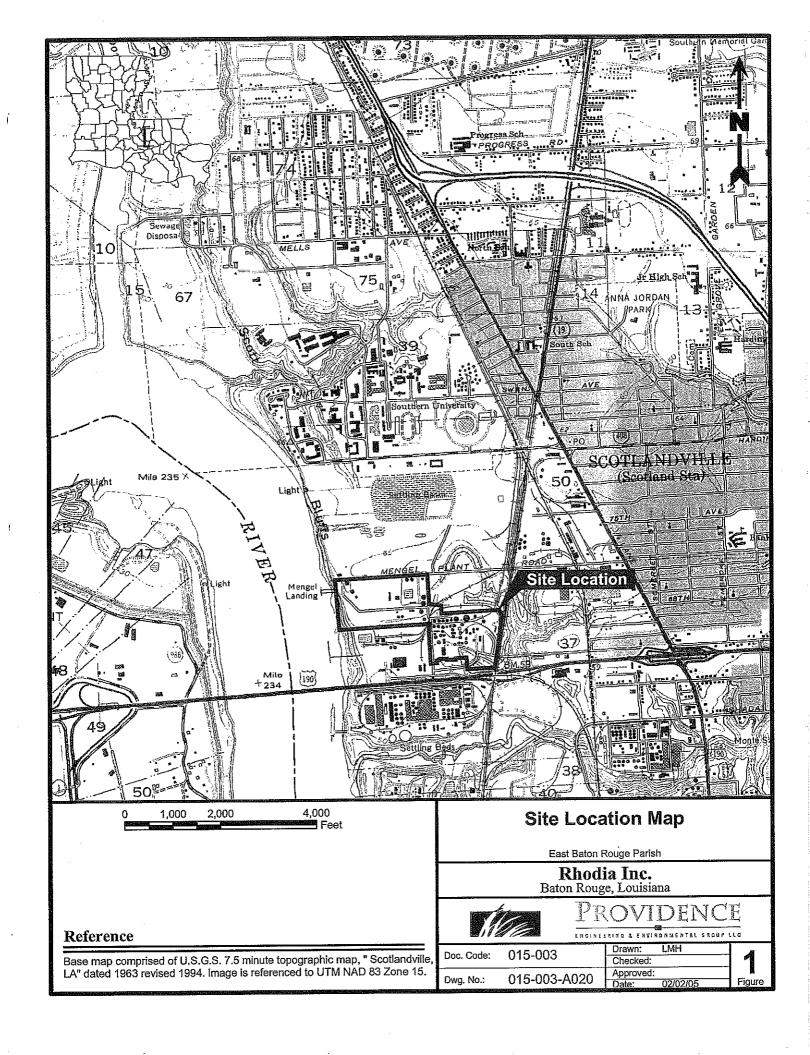
#### PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	0	Ο,	•	No change from current permit
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33.III.5111)?	0	0	•	
517.D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	0	•	0	No change from current permit
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K,	0	0	•	
517 D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	0	0	•	
517.D.16, 18	Has any Additional Information been Provided?	0	•	0	
517.D.17 Fees	Has the Fee Code been Identified?	•	0	0	AAE - Section 5
	Is the Applicable Fee Included with the Application?	•	0	0	
517.E.1 Additional Part 70 Requirements	Does the Certification Statement Include a Description of the Compliance Status of Each Emission Point in the Source with All Applicable Requirements?	•	0	0	AAE - Section 10
517E.2 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will continue to Comply with All Applicable Requirements with which the Source is in Compliance?	•	0	0	AAE - Section 10
517.E.3 Additional Part 70 Requirements	Does the Certification Statement Include a Statement that the Source will, on a timely basis, meet All Applicable Requirements that will Become Effective During the Permit Term?	•	0	0	AAE - Section 10
517.E.4 Additional Part 70 Requirements	Are there Applicable Requirements for which the Source is not in Compliance at the Time of Submittal?	0	•	0	
	Does the Application include a Compliance Plan Schedule?	0	0	•	
	Does the Schedule Include Milestone Dates for which Significant Actions will occur?	0	0	•	
	Does the Schedule Include Submittal Dates for Certified Progress Reports?	0	0	•	
517.E.5 Additional Part 70 Requirements Acid	Is this Source Covered by the Federal Acid Rain Program?	0	•	0	
Rain	Are the Requirements of LAC 33.III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	0	0	•	

#### PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.E.6 Additional Part 70 Requirements	Have any Exemptions from any Applicable Requirements been Requested?	0	•	0	No new exemption requests
	Is the List and explanations Provided?	0	0	•	
517.E.7 Additional Part 70 Requirements	Does the Application Include a Request for a Permit Shield?	0	•	0	No new shields requested
	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding Draft Permit Terms and conditions which are Proposed to Maintain Compliance?	0	0	•	
517.E.8 Additional Part 70 Requirements	Does the Application Identify any Reasonably Anticipated Alternative Operating Scenarios?	0	•	0	
	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including Source Process and Emissions Data?	0	0	•	
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	0	•	0	
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting for the Change?	0	0	•	No new requirements
	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	•	0	0	cover letter
	Does the Certification also Request that Minor Modification Procedures be Used?	•	0	0	cover letter
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	0	0	•	
La. R.S. 30:2018 – PSD/NNSR only	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to	0	0	•	
	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to the designated public library at no cost to the designated public	0	0	•	

## Appendix A Site Location Map



### Appendix B Emission Calculations

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana Cathyval Plant

Unit:

Cathy 301

EIQ I.D.: Description:

Phenolic Reactors Vent Scrubber C-209 (P&I.D. F201)

		Normal O	peration <sup>1</sup>	Hot Wat	er Flush <sup>2</sup>	Outage <sup>3</sup>	O	verall Emiss	ions
Pollutant	Removal Efficiency (%)	Emissions (lbs/hr)	Hrs/Yr	Emissions (lbs/hr)	Hrs/Yr	Lbs/Yr	Average Hourly Emissions (lbs/hr)	Maximum Hourly Emissions (lbs/hr)	Annual Emissions (tpy)
Phenol	≥98	4.63E-05	8660	1.00	100	0.556	0.01	1	0.05
Pyrocatechol	≥99.9	4.63E-04	8660	0.10	100		0.00	0.1	0.007
Hydroquinone	≥53	6.53E-05	8660	0.01	100		0.000	0.01	0.001
Total VOC	<u> </u>						0.01	1.1	0.06

#### Nates

- 1 Based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used.
- 2 Estimate of emissions using 212F water in scrubber from Steve Levin, 4-19-2011, rounded up.
- 3 Scrubber Water Shut Off During Plant Outage:, nitrogen sweep shut off:

Basis: Upon shutdown and nitrogen sweep being shut off, the vessels are allowed to cool down (contracting vapor, no emissions). Before startup, and at other times if needed, external heat may be applied to prevent freezing. Estimate emissions as follows:

Number of total heat-ups per year, (5 vessels, 10X each)	50
Temp increase per event	10 F
Phenol MW	94.113
Phenol freezing point	105.6 F
Assumed tank temp prior to heating	115.6 F
Tibbannot totale transpipers	575.6 R
	319.6 K
Vapor Pressure of Phenol at assumed temp	0.040 psia
Total pressure	14.7 psia
	1.00 atm
Mole fraction phenol, yi	0.00272
Vapor Space Volume	8000 gals
Universal Gas Constant,R	0.7302 atm·ft3/lbmole·R
Total moles in vapor space prior to heating	2.5446 lbmoles
Total moles phenol in vapor space prior to heating	0.0069 lbmoles
Vapor Expansion Factor	1.017
Phenol emitted per heat-up event	1.18E-04 lbmoles
	0.011 lbs
Total Emissions (assume all phenol)	0.556 lbs

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana Cathyval Plant

Unit:

Cathy

EIQ I.D.: Description:

OSBL Tank Farm Scrubber C-319 (P&I.D. F107)

		Nor	mal Opera	ation <sup>4</sup>	Hot Wate	er Flush	Outag	e <sup>5</sup>	Ov	Overall Emissio		
									Average	Maximum		
	Removal				'	1			Hourly	Hourly	Annual	
	1	Emissions			Emissions	[	Emissions		Emissions	Emissions	Emissions	
	(%)	(lbs/hr)	Basis	hrs/yr	(lbs/hr) <sup>3</sup>	Hrs/Yr	(lbs/hr)	hrs/yr	(lbs/hr)	(lbs/hr)	(tpy)	
Phenol	>98	3.17E-05	1	8660	0.01	100			0.0001	0.01	0.001	
Isopropyl Ether	≥98	0.022	2	8420	13.5	100	0.97	240	0.202	13.50	0.88	
Total VOC		V.022							0.202	13.51	0.88	

#### Notes:

Calculate Breathing Losses During Plant Outage with Nitrogen Sweep Off<sup>6</sup>:

Calculate Breathing Losses During Plant Outage	D-315	D-107	D115
T. I. D. T. T. T. T. T. T. T. T. T. T. T. T. T.	10-313	D-107	
Tanks Program Inputs:	IPE	Water w/ trace	IPE
Type of Tank	Vertical	Vertical	Vertical
shell height (ft)	16	18	18
shell diameter (ft)	25	29	20
maximum liquid height (ft)	14.4	17.0	17.0
average liquid height (ft)	12.8	0.5	0.5
Volume (gals)	52,877	89,000	42,000
Turnovers per year	0	0	0
Net Throughput (gals/yr)	0	0	0
Is Tank Heated?	N	N	N
roof color/shade	white/white	white/white	white/white
roof condition	good	good	good
roof type (cone or dome)	cone	cone	cone
height of cone	0	0	0
slope of cone roof (ft/ft)	0.0625	0.0625	0.0625
shell color/shade <sup>3</sup>	white/white	white/white	white/white
shell condition	good	good	good
vacuum settings (inches H2O), this is N2 makeup se	1	1	1
pressure settings (inches H2O), this is water depth in	10	10	10
vacuum settings (psig)	0.036	0.036	0.036
pressure settings (psig)	0.361	0.361	0.361
Tanks Program Outputs:			
Highest Monthly Emissions (June), lbs/mo	133.53	383.38	182.08
Additional Calcs:			
Pre-scrubber average lbs/hr (for note 5 outage)	0.19	0.53	0.25
Scrubber Efficiency	98%	98%	98%
Post-scrubber average lbs/hr (for note 4 outage)	0.004	0.011	0.005

<sup>&</sup>lt;sup>6</sup> Assume zero breathing loss from the phenol tanks due to decreasing or constant temperature.

Based on stack testing conducted by ESE, June 1995. The maximum of the three test runs was used.

<sup>&</sup>lt;sup>2</sup> Based on stack testing conducted by G&M, Dec. 1996. The average emission rate is during R/C loading at normal scrubber flow rate.

<sup>&</sup>lt;sup>3</sup> For IPE, this is rate exiting condenser (normal inlet to scrubber) from design calcs Apx B. For phenol, estimate from Steve Levin 4-20-11, rounded up.

<sup>&</sup>lt;sup>4</sup> This scenario also includes a planned plant outage where nitrogen sweep is off, condenser is off, and scrubber is on. These emissions are less than normal as estimated below.

<sup>&</sup>lt;sup>5</sup> This scenario is a planned plant outage where nitrogen sweep is off, condenser is off, and scrubber is off. These emissions are greater than normal (as estimated below) and must be included in annual limit.

<sup>&</sup>lt;sup>7</sup> Used 100% IPE as conservative estimate.

Rhodia, Inc.

Baton Rouge, East Baton Rouge Parish, Louisiana Cathyval Plant

Unit:

Cathy

EIQ I.D.:

304

Description:

PC Flaker Vent Scrubber C-561 (P&I.D. F508)

		Normal C	operation <sup>3</sup>	Hot Wate	r Flush	Ov	erall Emissi	ons
	Removal					Average Hourly	Maximum Hourly	Annual
	Efficiency	Emissions <sup>1</sup>		Emissions		Emissions	Emissions	Emissions
	(%)	(lbs/hr)	Hrs/Yr	(lbs/hr) <sup>2</sup>	Hrs/Yr	(lbs/hr)	(lbs/hr)	(tpy)
Pyrocatechol	≥98	0.010	8744	0.300	100	0.013	0.300	0.059
Total VOC						0.013	0.300	0.059

#### Notes:

<sup>&</sup>lt;sup>1</sup> Cathy Project Air Permit Data, Section 5, 3/6/90, outlet flow.

<sup>&</sup>lt;sup>2</sup> Cathy Project Air Permit Data, Section 5, 3/6/90, inlet flow.

<sup>&</sup>lt;sup>3</sup> Includes a planned plant outage with the scrubber off. Emissions are less than or equal to normal emissions due to low vapor pressure materials. Scrubber will be back online before vessels are heated.

### (2012)

#### AIR, PESTICIDES, AND TOXICS 6TH FLOOR RECORDS CENTER INFILE / NEW FILE FORM

ose from the file types below:				
Air Facility	TSCA	·		
AR- Acid Rain	AH - Asbestos Ha	zard Emergency Resp	oonse Act	
CB- Confidential Business	AS or AW - Asbes	AS or AW - Asbestos or Asbestos Worker Prot.		
CO- Compliance	CB - Confidential	CB - Confidential		
EN- ** Enforcement	SI - Site Specific	SI - Site Specific		
GE- General	FO - Non Site Spec	cific		
X PE- Permit	IM - ** Section 5	* 8		
RA- Regulatory Applicability	LB - ** Lead		Proj No:	
Other:	PC - **PCB	D	LDEQ AI: 131	
** Extension of File Type (if needer	d): S - Enforcement Sensitive	Permit Type Minor Pmt No: PSD Pmt No:	Number	
D	P - Docket Number	TV Pmt No: NNSR Pmt No: CAIR Pmt No:	0840-00033-V5	
EPCRA / SARA	<u>FIFRA</u>	AR Pmt No:		
	· 	•		
Number: 11 0000 450 100	Company Name: Rhodia Ir	nc		
Name: Sulfuric Acid Regeneration Plant	Area Name:			
Street: 1275 Airline Hwy	Fac City: Baton Ro	uge		
Cnty: East Baton Rouge	Fac State: LA	Fac Zip:	70805	

Permit(s):

214 - 665 -7258

Requestor's Phone:



#### RECEIVED

12 OCT 10 AMII: 09

September 7, 2012

AIR PERMITS SECTION
6PD-R

Mr. Sanford Phillips, Assistant Secretary (Hand Delivered, original + 2 copies)
Louisiana Department of Environmental Quality
Office of Environmental Services; Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313

EPA Region 6 (6PD-R) 7010 1670 0001 8962 1445 Ross Avenue, Ste. 1200 Dallas, TX 75202-2733

Subject:

Application for Minor Permit Modification to Part 70 Permit

Sulfuric Acid Plant; Title V Permit No. 0840-0033-V4 Rhodia, Inc., Baton Rouge, LA; Agency Interest No. 1314

Dear Mr. Phillips:

On March 15, 2012, LDEQ issued a Title V Permit Modification to Rhodia for the Sulfuric Acid Plant. Rhodia is requesting that minor permit modification procedures be used to reconcile emission rates and make other minor corrections/updates. The requested changes do not modify, remove, or add any federally-enforceable applicable requirements nor have any new federally-enforceable requirements become applicable since the last permit modification/renewal. A draft permit is not included (per LAC 33:III.525.B.2.c) because the requested changes are minor and the overall permit will remain largely unchanged.

LAC 33:III.525.B.2.b requires certification by responsible official that the proposed modification meets the criteria listed in LAC 33:III.525.A for a minor modification. By signature below, I certify that the proposed modification meets the criteria in LAC 33:III.525.A.2 for a minor modification.

If you have any questions or require any further information, please call John Richardson at 359-3768 or Julie Sheffield at 359-3432.

Sincerely,

Daniel Tate Plant Manager

File 402.1.2

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

# **LOUISIANA**

# Application for Approval of Emissions of Air Pollutants from Part 70 Sources



PLEASE TYPE OR PRINT

1. Facility Information	on [LAC	<b>33:III.517</b> .	D.1]							
Facility Name or Process	Unit Name	(if any)						All Pro	cess Units	s
Sulfuric Acid Plant	Sulfuric Acid Plant						Proces	s Unit-Spa	ecific Permit	
Agency Interest Number (A.I. Number) Currently					ently Effect	ive Per	mit Nun	aber(s)		
1314							084	0-0003	3-V4	
Company - Name of Owne	r									
Rhodia, Inc.										
Company - Name of Opera	ator (if dif	ferent from C	wner)							
N/A										
Parent Company (if Comp The Solvay Group	any – Nan	ne of Owner g	given ab	ove is a divi	sion)					
Ownership:										
Check the appropriate box.			_					_		
corporation, partnership,	or sole prop	rietorship		regulated uti	ity		munic	ipal gover	nment	
state government				federal gove	rnment		other,	specify		
What modifications/changes				? Add more	rows as	necessary.				
		see next p	aye							
Nearest town (in the same	parish as t	he facility):		Pari		here facilit	_	ated:		
Baton Rouge		_				Baton Roug		-		
Distance To (mi): Latitude Front Gate:	~222 30	-Texas		269 Arka 30 Min	nsas -	~129	$-\frac{\text{Missi}}{\text{Sec}}$	ssippi _	~262	_Alabama
Lantinde Front Gate: Longitude Front Gate:	-91	_Deg Deg		Min Min	-	30 16	_Sec Sec	-	30 58	Hundredths Hundredths
Distance from nearest Clas			Kilon		-		_ 500	-		
Add physical address and do more rows as necessary.										
1275 Airline Highway, Bat bank of the Mississippi Ri		LA 70805. I	Knodia i	s located in	nmediat	ely noπn c	T High	vay 190	along the	east :
burn of the idioplopiph M	<i>r</i> 01.									
■ Map attached (require  □ Description of process ■ Introduction/Descripti	ses and pro	ducts attached	(require					hange fr	om curren	t permit

#### **Modifications Addressed in Permit Application Forms:**

- The sulfur feed tank (EIQ 20, EQT 0146) emissions are being reconciled to incorporate test results from February 2012. A report was submitted to LDEQ dated March 29, 2012. Hydrogen sulfide (class III TAP) emissions are being increased to above its MER. See Appendix C for Chapter 51 discussion.
- In March 2013, the Unit 1 Pre-heater stack (EIQ 10, EQT 0140) and the heat exchanger associated with the pre-heater will be replaced. The pre-heater furnace itself will not be replaced. An EIQ form is included to modify the stack physical characteristics. The SO2 emissions are also being reconciled to use the AP-42 factor instead of sulfur content of natural gas (unrelated to heat exchanger project).
- PM10 and NOx emissions for the Acid Plant Vapor Combustor (APVC, EIQ 27, EQT 0151) are being reconciled using new natural gas usage data from a recently-installed natural gas meter.
- Stack discharge characteristics for the TS Vapor Combustor (TSVC, EIQ 21, EQT 0147) and Acid Plant Vapor Combustor (APVC, EIQ 27, EQT 0151) are being updated based upon recent testing.
- Per the condensable PM policy, EIQ forms for sources that emit sulfuric acid (EIQ 12 Oleum Loading Vent Scrubber, EIQ 24 Oleum Barge Loading Scrubber, and Fug-Acid Acid Plant Fugitive Emissions) have been modified to include PM10 as a pollutant. Note that condensable PM was addressed in a previous permit modification for Unit 1 and Unit 2 (sources RLP 0014, RLP 0013, CAP-SAU). Stack gas characteristics are also being updated for EIQ 24.
- · Minor reconciliation of GC XVII emissions, including adding PM10 as a pollutant for activities that emit sulfuric acid.

#### Other Modifications/Corrections:

- Based on testing conducted in June 2012 on the Caustic Scrubber (EIQ 13, EQT 0277; report was submitted to LDEQ on 8/3/12):
  - o Rhodia requests that the minimum pH per SR #38 be changed from 7 to 6
  - o Rhodia requests that the averaging basis for pH and flow rate per SR #s 38 and 41 be changed from a 4-hour average to a 1-hour average
  - o SR #s 37 and 39 are the associated monitoring requirements and they should have "none specified" or "1-hour average" for the Statistical Basis
- Remove the outdated phase II emissions from the Emission Rate Tables
- Remove the outdated/completed SR #s 227, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 278, 279
- Note that SR #s 189 and 199 are redundant, please retain only #199
- Permit V4 added the ABCO boiler to CAP-Comb but neglected to increase the SO2 emission rate in the Emission Rate Table. The emission rate (phase III) should be 1076.13 tpy
- On page 6 of 7 in the Inventory, Subject Item Groups, GRP 0021, the Group Description should include the Package (ABCO) boiler since permit V4 added that boiler to the group
- Per a meeting with LDEQ on 6/19/12 and subsequent discussion with Bryan Johnston on 8/20/12, Rhodia requests that SR# 362 be replaced with 2 new SRs as follows. Appendix B includes additional information about the individual and total TAP/HAP emission limits.
  - o "The total emissions of all pollutants listed for Process Group Spt-Proc (PCS 0001) in the table "Emission Rates for TAP/HAP & Other Pollutants" shall not exceed 0.56 tons/year. These emissions shall be calculated and recorded annually, both for each individual pollutant and the sum. These records shall be kept onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 0.56 tons/year for the sum of Spt-Proc pollutants in any calendar year shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division."
  - o "The total emissions of all pollutants listed for Process Group TS-Proc (PCS 0002) in the table "Emission Rates for TAP/HAP & Other Pollutants" shall not exceed 2.02 tons/year. These emissions shall be calculated and recorded annually, both for each individual pollutant and the sum. These records shall be kept onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division. Emissions greater than 2.02 tons/year for the sum of TS-Proc pollutants in any calendar year shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division."
- Remove pollutant "Toxic Air Pollutants" from the Emission Rates Table for process groups Spt-Proc and TS-Proc. This is unnecessary with the addition of the 2 new SRs above.

		∡AC 33.1.Ch	-						
• •		*	information <u>except</u>				•	☐ Yes	■ No
submittal th	at is separate j	from this appli	fidentiality is reques cation. Information	sted below for which c	Add ro onfiden	ws as necesso tiality is requ	ary. Confider uested should	ntiality reques not be submit	sts require a tted with this
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4 Type o	of Applicati	ion [LAC 33	B:III.517.D1						
			2) that corresponds	to the type	of pe	rmit being so	ought. Check	all that app	ly within the
appropriate			-						
Column 1				Colu	mn 2				<del></del>
☐ Part 7	0 General				Part 70	Regular			
Renev	val				Renew	ral .			
Select one, i	f applicable:			Select	one, if	applicable:			
☐ Entire	ly new facility				Entirel	y new facility			
1 1 1	ication or expan	sion of existing fa	acility (may also includ	le 📗			ion or expansions) [LAC 33:III.		cility (may also
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Indivi	dual emissions u	nit(s) addition			Recon	ciliation only			
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Select one if Previo	f this application ously Grandfat	on is for an exis hered (LAC 33 d (e.g., Small S	tion was submitted: sting facility that doe :III.501.B.6) Source Exemption; L						
ricyr	ously Onpoini	liou .							
Fee Parameter he	eter: If the fee ere. per ton dai	ly rate capacity	n an operational par						
	Category: Ent the facility.	er the Standard	Industrial Classifica	ition (SiC) a	na ivor	ın American i	maustry Class	meanon (NA	1C3) Codes
Primary SI Secondary	CC:	2819 N/A	NAICS Cod	e: <u>32</u>	5188		Market .		
			<u>.</u>		1.4			,, +	na mr ot
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FEE CODE	TYPE	EXISTING CAPACITY	CAPACITY INCREASE	MULTIP	LIER	NSPS	PSD	AIR TOXICS	TOTAL AMOUNT
0540	minor								\$ 1,556.00
<u></u>		_!		<u> </u>				TOTAL	\$ 1,556.00

**Optional** Fee Explanation: Use the area will help to avoid confusion.	space provided to give an explanation of th	e fee determination displayed above. Using this
Minimum minor mod fee applies pe	er LAC 33:III.211.B.13.d. Emissions are	e being reconciled only.
Electronic Fund Transfer (EFT): If pa EFT Transaction Number, the Date that the application fee using EFT, leave blank. EFT Transaction Number	aying the permit application fee using an E he EFT was made, and the total dollar amore  Date of Submittal	Electronic Fund Transfer (EFT), please include the unt submitted in the EFT. If not paying the permit  Total Dollar Amount
6. Key Dates		
Estimated date construction will commen	ce: Estimated date	operation will commence:
LDEQ as of the date of submittal of this during the permit review process, unless	s application. If none, state "none" in the requested by LDEQ. **	table. **It is not necessary to update this table
Process Unit Name	Permit Number	Date Submitted
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renewals -  Does the company or owner have federal you are applying in Louisiana or other statementalities who own a controlling interest of	ates? (This requirement applies to all indiv	sources and permit  of, or of a similar nature to, the permit for which iduals, partnerships, corporations, or other ticipate in the environmental management of the
If yes, list States:		
Do you owe any outstanding fees or final If yes, explain below. Add rows if necesso		☐ Yes ☐ No
	ica mating company.	No Ricate of Good Standing from the Secretary of sation as an appendix.

If yes, check the appropriate boxes to indicate the type of position which the shield is being requested. Give an explanation additional pages if necessary. If additional pages are used the Explanation field.	of the circumstances that will justif	y the permit shield request. Attach
Type of Permit Shield request (check all that apply):		
Non-applicability determination for:	Specific Citation(s)	Explanation
☐ 40 CFR 60		
☐ 40 CFR 61		
☐ 40 CFR 63		
☐ Prevention of Significant Deterioration		
☐ Nonattainment New Source Review		
Interpretation of monitoring, recordkeeping, and/or reporting requirements, and/or means of compliance for:	Specific Citation(s)	Explanation
☐ 40 CFR 60		
☐ 40 CFR 61		
☐ 40 CFR 63		
☐ Prevention of Significant Deterioration		
☐ Nonattainment New Source Review		
State Implementation Plan (SIP) )  Regulation(s) referenced in 40 CFR 52 Subpart		

# 10. Certification of Compliance with Applicable Requirements

Statement for Applicable Requirements for Which the Company and Facility Referenced In This Application Is In Compliance

Based on information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application. For requirements promulgated as of the date of this certification with compliance dates effective during the permit term, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

For corporations only: By signing this form, I certify that, in accordance with the definition of Responsible Official found in LAC 33:III.502, (1) I am a president, secretary, treasurer, or vice-president in charge of a principal business function, or other person who performs similar policy or decision-making functions; or (2) I am a duly authorized representative of such person; am responsible for the overall operation of one or more manufacturing, production, or operating facilities addressed in this permit application; and either the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or the delegation of authority has been approved by LDEQ prior to this certification.\*

United St statements reasonable Applicatio 70 Source	CATION: I certify, unates law which provide, that based on information inquiry, the statements on for Approval of Emisses, including all attachmabove, are true, accurate,	de criminal pration and be and information sions of Air Pents thereto a	penalties for fals elief formed after on contained in thi ollutants from Par and the compliance	e drawings er knowledg s	, and design are true	and accurate	to the best of my			
	sible Official				sional Engineer					
Name				Name						
	Daniel Tate	· · · · · · · · · · · · · · · · · · ·			Julie Baron Sheff	ield				
Title				Title						
	Plant Manager				Environmental Co	onsultant	·-·			
Company				Company						
	Rhodia, Inc.				JBS, L.L.C.					
Suite, mail	l drop, or division			Suite, ma	il drop, or division					
Street or P	O. Box			Street or	P.O. Box	West.				
	PO Box 828				PO Box 828					
City		State	Zip	City		State	Zip			
	Baton Rouge	LA	70821		Baton Rouge	LA	70821			
Business p	hone			Business	phone					
	(225) 359-3751			(225) 359-3432						
Email Add	lress			Email Address						
	Daniel.Tate@ US.RI	HODIA.com			Julie.Sheffield@US.RHODIA.com					
	of responsible official (S		0.2)	Signature	an a t 173 '	***************************************				
Date 9	/13/12			Date (	Signature of Professional Engineer  Julie Baron Sheffeld  Date 9-5-12					
*Approval	of a delegation of autho	rity can be req	uested by	Louisiana Registration No. 24677						
completing (Form_72	g a Duly Authorized Rep 18) available on LDEQ's w.deq.louisiana.gov/ports	resentative De website at	esignation Form		JULIE A. REG. No. REGISTE Professional IN	Cha Co				
form_719 01/31/11			(	5	CAL ENG	MEERINGER				

11. Personnel [LAC 33:III.517.D.1]

a. Manager of Facility who is located at plant site			b. On-site contact regarding air pollution control						
Name			Primary Contact	Name			Primary Contact		
	Daniel Tate				John Richardson				
Title				Title					
	Plant Manager				Environmental Ma	anager			
Company		•••		Company					
	Rhodia, Inc.				Rhodia, Inc.				
Suite, mail	drop, or division			Suite, mail	drop, or division				
Street or P.	O. Box			Street or P	.O. Box				
	PO Box 828				PO Box 828				
City		State	Zip	City		State	Zip		
	Baton Rouge	LA	70821		Baton Rouge	LA	70821		
Business p	hone			Business p					
	(225) 359-3751				(225) 359-3768				
Email Add	ress			Email Add	lress				
	<u>Daniel.Tate@ US.RI</u>	HODIA.com		<u> </u>	John.Richardson@	<b>DUS.RHODIA</b>	com		
		<u>-</u>		1					
	to contact with written	corresponde		<del>-i</del>	who prepared this r	eport	D.i. Contoot		
Name			Primary Contact	Name			Primary Contact		
	John Richardson				Julie Sheffield				
Title	Environmental Man	ager		Title	Environmental Co	onsultant			
Company	······································			Company	Company				
	Rhodia, Inc.				JBS, LLC				
Suite, mail	drop, or division			Suite, mail	drop, or division				
Street or P.	O. Box			Street or P	.O. Box				
	PO Box 828		•		PO Box 828				
City		State	Zip	City	10.7371117	State	Zip		
	Baton Rouge	LA	70821		Baton Rouge	LA	70821		
Business p	hone			Business p	hone				
	(225) 359-3768				(225) 359-3432	****			
Email Add	ress			Email Add	lress				
	John.Richardson@l	JS.RHODIA.c	<u>com</u>		Julie.Sheffield@U	S.RHODIA.co	<u>om</u>		
e. Person t	to contact about Annua	al Maintenan	ce Fees						
Name			Street or P						
John Richardson				PO Box 828	0.1	7:			
Title			City	B B	State	Zip			
	Environmental Man	ager		<u></u>	Baton Rouge	<u>LA</u>	70821		
Company	wa			Business phone					
	Rhodia, Inc.				(225) 359-3768				
Suite, mail	drop, or division			Email Add		<b></b>			
				1	John.Richardson(	@US.RHODIA	<u>com</u>		

12. Proposed Project Emissions [LAC 33:III.517.D.3]

List the total emissions following the proposed project for this facility or process unit (for process unit-specific permits). Speciate all criteria pollutants, TAP, and HAP for the proposed project.

Pollutant	Proposed Emission Rate (tons/yr)					
The pollutants being modified are listed below. Other pollutants will remain at currently permitted rates and, for brevity, are not listed below.						
PM <sub>10</sub>	58.95					
SO <sub>2</sub>	1077.96					
NOx	. 118.64					
СО	103.81					
VOC Total	29.87					
Total HAPs	9.41					
Total TAPs	52.60					
Hydrogen sulfide	2.21					
Carbon Disulfide	0.91					
Carbonyl Sulfide	0.49					

## 13. History of Permitted Emissions [LAC 33:III.517.D.18]

List each of the following in chronological order:

- The Permit Number and Date Action Issued for each air quality permit that has been issued to this facility or process unit (for process unit-specific permits) within the last ten (10) years.
- All small source exemptions, authorizations to construct, administrative amendments, case-by-case insignificant activities, and changes of tank service that have been approved since the currently effective Title V Operating Permit or State Operating Permit was issued to this facility or process unit (for process unit-specific permits). It is not necessary to list any such activities issued prior to the issuance of the currently effective Title V Operating Permit or State Operating Permit, if one exists.

Permit Number	Date Action Issued
0840-00033-V0	October 12, 2005
0840-00033-V1	March 14, 2007
0840-00033-V2	November 30, 2009
0840-00033-V3	May 11, 2011
0840-00033-V4	March 15, 2012

14 a	Enforcement Actions	ILAC 33:III.517.D.18] -	П	Yes	No

If yes, list all federal and state air quality enforcement actions, settlement agreements, and consent decrees received for this facility and/or process unit (for process unit-specific permits) since the issuance of the currently effective Title V Operating Permit or State Operating Permit. For each action, list the type of action (or its tracking number), the regulatory authority or authorities that issued the action, and the date that the action was issued. Summarize the conditions imposed by the enforcement action, settlement agreement, and consent decree in Section 23, Table 2. It is not necessary to submit a copy of the referenced action. Add rows to table as necessary.

Type of Action or Tracking Number	Issuing Authority	Date Action Issued	Summary of Conditions Included?
			☐ Yes ☐ No

14.b. Schedule If the facility or proc description of how co instructions.	ess unit for w	hich applicatio	on is being made is t	not in f	ull compliant					a
15. Letters of A If yes, list all corresp of compliance with a issuance of the letter table. Letters that are	ondence with ny applicable and the regul	LDEQ, EPA, regulations fo ation reference	or other regulatory lear this facility or pro- ed by the letter. Att	oodies t cess un a <b>ch as</b>	that provides it (for proces an appendix	s unit-specifi a copy of al	c permi I docur	its). List th nents refe	e date o	of
Date Letter I	ssued	Issuin	g Authority		Referenced 1	Regulation(s	)	Copy of Letter Attached?		
								☐ Yes	S 🗆	No
								☐ Yes	\$	No
If yes, list any initial process unit (for process unit (for process unit in order to sat been satisfied should should also be proper	ess unit-spec isfy regulator be listed in S	ific permits) si y requirement ection 23, Tab	nce the issuance of s. Any initial notifical left 2 of this application.	the cur cation c ion. An	rently effecti or one-time peny ny notificatio	ve Title V Op erformance to ms or perform	erating est requ nance te	g Permit or irements th	State Op at have	perating not
Initial Noti	fication or	· .						Da		
One-time Perfo	rmance Test		latory Citation Sat		Applicable	e Source(s)	<u>C</u>	Completed/	Approv	/ed
Initial SO2 and Opp Te	-		CFR 60.8 and 60.85 Action No. 2; 07-CV- WCL; SR#227		Unit No. 1, RLP 014		completed June 4-5, 2012		012	
SO2 CEMS Initia Evalu		e 4	0 CFR 60.84(a) and 60.13(c)	i	Unit No. 1, RLP 014 comp			leted June	4-5, 2	012
17. Existing Prevention of Significant Deterioration or Nonattainment New Source Review Limitations [LAC 33:III.517.D.18]  Do one or more emissions sources represented in this permit application currently operate under one or more NSR permits?  Yes ■ No  If "yes," summarize the limitations from such permit(s) in the following table. Add rows to table as necessary. Be sure to note any annual emissions limitations from such permit(s) in Sections 13 and 14 of this application.										
Permit Number	Date Issued	Emission	Pollutant	BAG	CT/LAER Limit <sup>1</sup>	Averaging Period		escription hnology/W Stand	ork Pr	
I	1	i		ı		I	ı			

<sup>1</sup>For example, lb/MM Btu, ppmvd @ 15% O2, lb/ton, lb/hr

## 18. Air Quality Dispersion Modeling [LAC 33:III.517.D.15]

Was Air Quality Dis	spersion Modeling as required by LAC 33:III performed	l in support of this permit application? (Air Quality
Dispersion Modelins	ng is only required when applying for PSD permits and a	as requested by LDEQ.)
□ Vec ■	No	

Has Air Quality Dispersion Modeling completed in accordance with LAC 33:III ever been performed for this facility in support of a air permit application previously submitted for this facility or process unit (for process unit-specific permits) or as required by other regulations AND approved by LDEQ?

■ Yes 
□ No

If yes, enter the date the most recent Air Quality Dispersion Modeling results as required by LAC 33:III were submitted:

For sulfuric acid: 10/6/2008; for TAP metals: May 2009; for other TAPs: March 2005; for SO2, approximately August 2004. The sulfuric acid modeling was submitted as part of a permit application because initial analysis indicated a PSD major modification. Analysis was later revised and the PSD application was withdrawn.

If the answer to either question above is "yes," enter a summary of the most recent results in the following table. If the answer to both questions is "no," enter "none" in the table. Add rows to table as necessary.

	The Paris I	Calculated Maximum Ground	Louisiana Toxic Air Pollutant Ambient Air Standard or
Pollutant	Time Period	Level Concentration	(National Ambient Air Quality
	·		Standard (NAAQS))
Sulfuric Acid	8-hour	22.32 µg/m <sup>3</sup>	23.8 μg/m <sup>3</sup>
	annual	21.88 µg/m <sup>3</sup>	80 μg/m <sup>3</sup>
SO2 Phase I emission rates (no longer in effect)	24-hour	335.04 μg/m <sup>3</sup>	365 µg/m³
in enecty	3-hour	1017.57 µg/m <sup>3</sup>	1300 µg/m <sup>3</sup>
Antimony (and compounds)	8-hour	0.46624 µg/m3	11.9 µg/m3
Arsenic (and compounds)	annual	0.00004 µg/m3	0.02 μg/m3
Barium (and compounds)	8-hour	0.88404 µg/m3	11.9 µg/m3
Chromium VI (and compounds)	annual	0.00004 µg/m3	0.01 μg/m3
Copper (and compounds)	8-hour	0.40913 µg/m3	23.8 µg/m3
Manganese (and compounds)	8-hour	0.27827 µg/m3	4.76 μg/m3
Nickel (and compounds)	annual	0.00004 μg/m3	0.21 μg/m3
Selenium (and compounds)	8-hour	0.35001 μg/m3	4.76 µg/m3
Zinc (and compounds)	8-hour	0.80561 μg/m3	119 µg/m3
MIBK	8-hour	323 µg/m <sup>3</sup>	4880 μg/m <sup>3</sup>
Dichloromethane	annual	0.86668 µg/m3	212.77 µg/m3
Acrylonitrile	annual	1.152 μg/m <sup>3</sup>	1.47 μg/m <sup>3</sup>
1,3-Butadiene	annual	0.723 µg/m <sup>3</sup>	0.92 μg/m <sup>3</sup>
Chlorine	8-hour	18.95 μg/m <sup>3</sup> <sup>*</sup>	35.7 μg/m³
Hydrochloric acid	8-hour	79.75 μg/m <sup>3 *</sup>	180 µg/m³
Hydrogen Sulfide	8-hour	264.82 µg/m³ <sup>*</sup>	330 µg/m³

<sup>\*</sup> Internal modeling studies conducted by Rhodia to assess impact of increased (reconciled) emission rates. Results available to LDEQ upon request.

## 19. General Condition XVII Activities -

Yes		No
-----	--	----

Enter all activities that qualify as Louisiana Air Emissions Permit General Condition XVII Activities.

- Expand this table as necessary to include all such activities.
- See instructions to determine what qualifies as a General Condition XVII Activity.
- Do not include emissions from General Condition XVII Activities in the proposed emissions totals for the permit application.

ID				E	mission Rat	es – TP	Y	
No.	Work Activity	Schedule	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	Other
Note:	Edits from current GC)	(VII List shaded gray.						
GC 1	Catalyst reconditioned in Sulfuric Acid Unit Nos. 1 & 2	Once each 12 months per unit	0.2					
GC 2	Drum re-packaging	4 times per year					0.002	
GC 3	Vacuum trucks used for tank cleanouts, spill cleanup, and sump clean out	Weekly		0.06			0.06	
GC 4	Tank and process equipment cleaning			0.1			0.90	
GC 5	Opening of trucks and railcars containing waste fuel and spent acid for sampling, inspection, maintenance, or further processing	Daily		0.5			0;15	
GC 6	Sampling waste fuel trucks, railcars, and tanks via sample tap	10 times per day					0.03	##
GC 7	Sampling spent acid and IFS trucks, railcars, and barges	8 times per day		0.004			0.004	
GC 8	Washing inside surface of Unit 1 exhaust stack	2 times per year	0.01*		0.25			0.01*
GC 9	Odor-neutralizing compounds						0.06	
GC 10	Manual gauging of tank levels			0.5			0.1	
GC 11	Melting sulfur solidified in piping and other equipment at the old sulfur pit (former EIQ ID 18)			<0.001				<0.001#
GC 12	readings from gas streams		0.1*	0.1				0.1*
GC 13	Loading fresh acid onto heel of spent acid			0.003			0.004	
GC 14	Maintenance that requires shutdown or bypass of Acid Plant Vapor Combustor (APVC)	240 hrs per year (max)		****			4.62	**
GC 15	Unloading containers of spent acid with chlorinated VOCs (carbon bed for VOCs, caustic scrubber if any SO2 present)	1 per week		0.1			0.06	**
* 0.16	ric Δcid Mist							

<sup>\*</sup> Sulfuric Acid Mist

<sup>#</sup> Hydrogen Sulfide

<sup>\*\*</sup> Speciated VOCs covered by Spent Acid Process permitted emissions

<sup>##</sup> Speciated VOCs covered by TS Process permitted emissions

Enter all active Expand this For sources each claim. To If aggregate greater than 5	nificant Activities [LAC 33:III.501.B. wities that qualify as Insignificant Activities. It table as necessary to include all such activities. It claimed to be insignificant based on size or emist in may include but is not limited to operating here emissions from all similar pieces of equipment to tons per year for any pollutant, then the activities ission sources. Consult instructions.	ssion rate (LAC 33:III.501.B.5.A), inforours, volumes, and heat input ratings. (i.e. all LAC 33:III.501.B.5.A.1 activities	es) claimed to be insignificant ar
Emission Point ID	Description	Physical/Operating Data	Citation
No.		,	
Note: Edit:	s from current IA list are shaded gray.		
20D962	Diesel Storage Tank, Firewater Pump	300 gals	LAC 33: III.501.B5.A.3
90D360	Diesel Storage Tank, Maintenance	1000 gals	LAC 33: III.501.B5.A.3
None	Diesel Storage Tank, IFS	1000 gals	LAC 33: III.501.B5.A.3
91D321	IFS Wash-water Storage Tank	9000 gals	LAC 33: III.501.B5.A.3
90D210	Laboratory Excess Sample Tank	100 gais	LAC 33: III.501.B5.A.2
Hoods	Different Analyses*	N/A	LAC 33: III.501.B5.A.6
	Drum Washing Operations	55 gals	LAC 33: III.501.B5.A.7
None	Temporary (Seasonal) Portable Gasoline Tank	550 gals	LAC 33: III.501.B5.A.8
21. Regular: 33:III.517	ciated with exhaust hoods for laboratory equipmental control or environmental monitoring purpose latory Applicability for Commonly [D.10]  ility contain asbestos or asbestos containing man	<sup>es.</sup> Applicable Regulations – An	
	facility or any portion thereof may be subject to 4		oter 27, and/or LAC 33:III.5151
	ication must address compliance as stated in Section		, 200

Is the facility or process unit represented in this permit subject to 40 CFR 68, or is any other process unit located at

Does the applicant own or operate commercial refrigeration equipment normally containing more than 50 pounds

**■** Yes

If "yes," the entire facility is subject to 40 CFR 68 and LAC 33:III. Chapter 59 and this application must address compliance as stated

☐ No If "yes," the entire facility is subject to 40 CFR 82, Subpart F and this application must address compliance as stated in Section 23 of

Yes

same facility as the process unit represented in this application subject to 40 CFR 68?

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in Section 23 of this application.

Table 5

Table 6

Table 7

this application.

Is the facility listed in LAC 33:III.5611

Yes

Yes

Yes

of refrigerant at this facility or process unit?

☐ No

□ No

No

# 22. Applicable Regulations, Air Pollution Control Measures, Monitoring, and Recordkeeping Important points for Table 1 [LAC 33:III.517.D.10]:

- List in Table 1, by Emission Point ID Number and Descriptive Name of the Equipment, state and federal pollution abatement programs and note the applicability or non-applicability of the regulations to each source.
- Adjust the headings for the columns in Table 1 as necessary to reflect all applicable regulations, in addition to any regulations that do not apply but need an applicability determination to verify this fact.
- For each piece of equipment, enter "1" for each regulation that applies. Enter "2" for each regulation that applies to this type of source, but from which this source of emissions is exempt. Enter "3" for equipment that is subject to a regulation, but does not have any applicable requirements. Also, enter "3" for each regulation that have applicable requirements that apply to the particular emission
- Leave the spaces blank when the regulations clearly would not apply under any circumstances to the source. For example, LAC 33:III.2103 Storage of Volatile Organic Compounds would never apply to a steam generating boiler, no matter the circumstances.
- Consult instructions.

## Important points for Table 2 [LAC 33:III.517.D.4; LAC 33:III.517.D.7; LAC 33:III.517.D.10]:

- For each piece of equipment listed in Table 2, include all applicable limitation, recordkeeping, reporting, monitoring, and testing requirements. Also include any one-time notification or one-time tests performance test requirements that have not been fulfilled.
- Each of these regulatory aspects (limitation, recordkeeping, reporting, etc.) should be addressed for each regulation that is applicable to each emissions source or emissions point.
- For each regulation that provides a choice regarding the method of compliance, indicate the method of compliance that will be employed. It is not sufficient to state that all compliance options will be employed, though multiple compliance options may be approved as alternative operating scenarios.
- Consult instructions.

#### Important points for Table 3 [LAC 33:III.517.D.16]:

- Each time a 2 or a 3 is used to describe applicability of a source in Table 1, an entry should be made in Table 3 that explains the exemption or non-applicability status of the regulation to that source.
- Fill in all requested information in the table.
- The exact regulatory citation that provides for the specific exemption or non-applicability determination should be entered into the Citation Providing for Exemption or Non-applicability column.
- Consult Instructions.

#### Important points for Table 4 [LAC 33:III.517.D.18]

- List any single emission source that routes its emissions to another point where these emissions are commingled with the emissions of other sources before being released to the atmosphere. Do not list any single emission source in this table that does not route its emissions in this manner.
- List any and all emission sources that are routed as described above. This includes emission sources that do not otherwise appear in this permit application.
- Consult instructions.

#### 23. Emissions Inventory Questionnaire (EIQ) Forms [LAC 33:III.517.D.3; 517.D.6]

Complete one (1) EIQ for:

- Each emission source. If two emission sources have a common stack, the applicant may submit one EIQ sheet for the common emissions point. Note any emissions sources that route to this common point in Table 4 of the application.
- Each emissions CAP that is proposed. In general, this applies to each source that is part of the CAP.
- Each alternate operating scenario that a source may operate under. Some common scenarios are:
  - 1. Sources that combust multiple fuels
  - 2. Sources that have Startup/Shutdown max lb/hr emission rates higher than the max lb/hr for normal operating conditions would need an EIQ for the Startup/Shutdown emission rates for those sources
- Fugitive emissions releases. One (1) EIQ should be completed for each of the following types of fugitive emissions sources or
- 1. Equipment leaks.
- 2. Non-equipment leaks (i.e. road dust, settling ponds, etc).

#### For each EIQ:

- Fill in all requested information.
- Speciate all Toxic Air Pollutants and Hazardous Air Pollutants emitted by the source.
- Use appropriate significant figures.
- Consult instructions.

The EIQ is in Microsoft Word Excel. Click on this link to get to the EIQ form. http://www.deq.louisiana.gov/portal/DIVISIONS/AirPermits/AirPermitApplications.aspx

### 24. NSR Applicability Summary [LAC 33:III.504 and LAC 33:III.509]

This section consists of five tables, A-E, and is applicable only to new and existing major stationary sources (as defined in LAC 33:III.504 or in LAC 33:III.509) proposing to permit a physical change or change in the method of operation. It would also apply to existing minor stationary sources proposing a physical change or change in the method of operation where the change would be a major source in and of itself. Add rows to each table as necessary. Provide a written explanation of the information summarized in these tables. Consult instructions.

						State of	Louisiana	ì						Date of Sub	mittal
				<b>Emissions</b>	Inventory	Questi	onnaire (E	IQ) f	or Air Pol	llutants				September	2012
Emission Point II			Descriptiv	e Name of the En	nissions Sot	ırce (Alt. N	ame)		[	Approximate Loca	ation o	of Stack or \	/ent (see in	structions)	
(Alternate ID	)								Method	28 - "GPS-U			Datum	•	D 83
10				Link 4 B					UTM Zone			945 mE	Vertical		
TEMPO Subject Item	n ID No.			Unit 1 P	reheater .				Latitude	30 degrees	30		sec <u>16</u>	hundredths	
EQT 0140	)								Longitude	-91 degrees	11			hundredths	
Stack and Discharge	Diameter	- I H	leight of Stack	Stack Exit	Stack Gas	1 870	ack Gas Exit	E	Normal	Date of Construc	tion	Percent		Throughput 1	through
Physical Characteristics	Stack Disch Area	narge	Above Grade	Velocity	at Conditi not at Star		emperature		rating Time rs per year)	or Modification	` }	Jan - Mar	Inis Emis Apr - Jun	Jul - Sep	Oct - Dec
Change?	3.5	ft	20.4	40 8/	i i		PEA 8E	\			ŀ		·······	<u> </u>	
Yes		ft²	62 ft	46 ft/sec	26,500	it/min	550 °F		8760	see notes		25%	25%	25%	25%
		Heat Ing	put (see instruct		ļ					Parameters (inclu	de un	its)			
<del>}                                    </del>	of Fuel		Heat Input (		Name of Oa		- (The same has a		Value	e/Parameter			Descript	ion	
a natura	ai yas						te/Throughput Rate/Through								
C					Design Cap			put							
		Notes			Shell Heigh					1					
in 2013, the heat exhan	ger and sta	ck will be	e replaced. The	preheater	Tank Diam					ļ					
furnace itself will not be				•••	Roof Type										
Emission Point IE	) No.				Air Pol	lutant Sr	ecific Infor	rmati	ion	•					
(Alternate ID	)	0 1			Ргороз	sed Emissi	on Rates		Permitted	Add Change	<u></u>	ntinuous			
10		Contro Equipme		HAP/TAP CAS	Average	Maximun	n Annual	1 .	ission Rate	Add, Change, Delete, or		mpliance	Concentra	tion in Gase	s Exiting at
L		Code		Number	(lb/hr)	(lb/hr)	(tons/yr)	1	(tons/yr)	Unchanged		/lethod		Stack	
Poliutant				***************************************				<del> </del>							
PM <sub>10</sub>		000			0.04	0.04	0.19	<b>+</b>	0,19	U					
SO <sub>2</sub>		000			0.003	0.003	0.01	· · ·	0.14	C					
NOx		000			0.56	0,56	2.45		2.45	U					-
CO	•	000			0.47	0.47	2.06		2.06	U					
VOC Total		000			0.03	0.03	0.13	<u> </u>	0.13	U					
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				Emissions I	Inventory	Questi	onnaire (E	IQ) fo	or Air Po	llutants				September	2012
Emission Point ID (Alternate ID)			Descriptiv	re Name of the En	nissions Sou	ırce (Alt. N	lame)			Approximate Loc	ation	of Stack or	Vent (see ir	structions)	
12			(	Dleum Loading	ı Vent Scr	uhher				28 - "GPS-l 15 Horizontal	674	,001 mE	Datum Vertical	3,376,6	
TEMPO Subject Item EQT 0142	i		Ì		, , , , , , , , , , , , , , , , , , , ,				Latitude Longitude	30 degrees -91 degrees		min 35 min 12		hundredths hundredths	
	Diameter Stack Disch	narne Heig	ght of Stack ove Grade	Stack Exit Velocity	Stack Gas at Condition	ons, Sta	ack Gas Exit emperature	Oper	Normal rating Time	Date of Construction		Percent		Throughput ssion Point	through
Characteristics Change?	Area 0.5		oro crado	Volution	not at Stan	idard	cimporatoro	(hour	rs per year)	or intodisous	••	Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
No		ft²	15 ft	4.4 ft/sec	51.84	ft³/min	100 °F		672	1		25%	25%	25%	25%
Type of Fue	I Used and	Heat Input	***************************************		,,				Operating	Parameters (incl	ıde u	nits)			
Fuel Type o	f Fuel		Heat Input	(MM Btu/hr)						/Parameter			Descript		
) a							te/Throughput			MMgal/yr			oleun		
b							Rate/Through	put	150	gpm			oleun	)	
С					Design Cap		me								
This scrubber normally very vent to atmosphere emissions are the same as PM10.	vents back i e in certain o	conditions.	The PM10 a	nd sulfuric acid	Shell Heigh Tank Diame Roof Type										
Emission Point ID	No.		······································		Air Pol	lutant Sr	oecific Info	rmati	on						
(Alternate ID)	)					ed Emissi		1							
12		Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Average (lb/hr)	Maximun (lb/hr)	(	Emi	ermitted ssion Rate tons/yr)	Add, Change, Delete, or Unchanged	Co	ontinuous ompliance Method	Concentra	tion in Gase Stack	es Exiting at
Pollutant					` ′	` ′	` ' '		,	·					
PM <sub>10</sub>		001	99.0%		0.01	0.09	<0.01			Α					
Sulfuric acid		001	99.0%	7664-93-9	0.01	0.09	<0.01	<u> </u>	<0.01	U					
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						State of	Louisiana							Date of Sub	mittal
				Emissions	Inventory	Questic	onnaire (E	IQ) f	or Air Pol	lutants				September	2012
Emission Point II (Alternate ID			Descriptiv	e Name of the En	nissions Sou	ırce (Alt. N	ame)			Approximate Loca	ation of Stacl	k or Vent	(see in:	structions)	
20 TEMPO Subject Iter	m ID No.			Sulfur Fe	ed Tank				Latitude	28 - "GPS-U 15 Horizontal 30 degrees	674,037 m 30 min	nE V 37 sec	Datum /ertical 98	NAD 3,376,79 hundredths	59mN
EQT 0146	6								Longitude	-91 degrees	11 min _	10 sec		hundredths	
Stack and Discharge Physical Characteristics	Diameter Stack Disch Area	arne He	eight of Stack bove Grade	Stack Exit Velocity	Stack Gas at Conditi not at Star	ons, Sta	ick Gas Exit emperature	Oper	Normal rating Time rs per year)	Date of Construc or Modification	uon	Th	is Emis	hroughput t sion Point Jul - Sep	
Change? Yes	1.2	ft ft²	30 ft	13.6 ft/sec	15.4	ft²/min	284 °F	Ì	8760		25%		.5%	25%	25%
Type of Fu			ut (see instruct	ions)				<u> </u>	Operating	Parameters (inclu	de units)				
	of Fuel		Heat Input (							/Parameter			escripti		
а							te/Throughpu		670	tons/day		sul	fur rece	ived	
b							Rate/Through	put							
С		<u> </u>			Design Car		me								
		Notes			Shell Heigh										
					Tank Diam	eter (II)			<u>-</u> :	xed roof					
Emiliation Bet 118	D.N T				Roof Type	Hartman C.	a alfie If			VEG 1001					
Emission Point II (Alternate ID	L		<del>                                     </del>				ecific Info	mati	on			- 1			
`	"	Control	Control	HAP/TAP CAS	Propos	sed Emissi	on Kates	P	ermitted	Add, Change,	Continuou	ıs   Co.	noontrot	ion in Gaso	s Exiting at
20		Equipmer Code	nt Equipment Efficiency	Number	Average (lb/hr)	Maximun (lb/hr)	n Annual (tons/yr)	Į.	ssion Rate tons/yr)	Delete, or Unchanged	Compliand Method	e Cor	ioci ili di	Stack	e willing at
Pollutant							<u> </u>	-				$\dashv$			
SO <sub>2</sub>		000			0.01	0.11	0.04	<del> </del>	0.01	С					
VOC Total		000			0.07	0.45	0.29	$\vdash$	0.02	Č		$\dashv$			
Carbon disulfi		000		75-15-0	0.07	0.45	0.29	l	0.02	С					
Carbonyl sulfi		000		463-58-1	<0.001	0.001	<0.01			A					
Hydrogen sulf	fide	000		2148878	0.49	2.23	2.16		0.44	С					
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					•	State of	Louisiana						Date of Sub	mittal
				Emissions I	nventory	Questi	onnaire (E	IQ) f	or Air Pol	lutants			September	2012
Emission Point II (Alternate ID	1		Descriptive	e Name of the Em	_		·	,		Approximate Locati	ion of Stack or \	Vent (see in	nstructions)	
21	·								Method	28 - "GPS-Un:		Datum		0 83
				TS VAPOR C	OMBUST	OR			UTM Zone	15 Horizontal 6		Vertical	3,376,6 hundredths	
TEMPO Subject Iter	n ID No.								Latitude Longitude	30 degrees 3 -91 degrees 1	30 min 35 11 min 10			
EQT147									Longitude .	91_ucgieesi		<u> </u>		
Stack and Discharge Physical Characteristics	Diameter Stack Disch Area	arge   Heigi	nt of Stack ve Grade	Stack Exit Velocity	Stack Gas at Condition	ons, St	ack Gas Exit emperature	Ope	Normal rating Time rs per year)	Date of Construction or Modification	Percent Jan - Mar	This Emi	Throughput ission Point Jul - Sep	through Oct - Dec
Change? Yes	6.0 t	1	50 ft	7.7 ft/sec	13,100	ft³/min	1,600 °F	Ì	8760		25%	25%	25%	25%
	el Used and	Heat Input (	(see instruct	ions)						Parameters (includ	e units)			
Fuel Type o	of Fuel		Heat Input (	MM Btu/hr)						/Parameter	N1-6	Descrip		
<b>—</b>	al Gas		11				ate/Throughpu			MMBTU/hr MMBTU/hr			aste vent gas aste vent gas	
"	/ent Gas		0.	2	i .		Rate/Through	put	11.0	WIND LOVIII	Natur	ai Gas + we	aste vent gar	?
C 1		l Notes	·		Design Cap Shell Heigh		urre_		<u> </u>					
· ·					Tank Diame									
Refer to process group	"TS Process	s" for specia	ated VOC T/	APs .	Roof Type	3101 (11)				ļ				
Emission Point I	D No.	*******				lutant S	pecific Info	mati	on					11.1.441
(Alternate IE	i i						ion Rates	<del>1                                    </del>		A LL Observe	Ozatiawana			
,	′	Control	Control	HAP/TAP CAS		l		_	ermitted ission Rate	Add, Change, Delete, or	Continuous Compliance	Concentra	ation in Gase	es Exiting at
21 Pollutant		Equipment Code	Equipment Efficiency	Number	Average (lb/hr)	Maximu (lb/hr)	<b>I</b>		(tons/yr)	Unchanged	Method		Stack	
PM10		000			0.08	0.08	0.37	<del>                                     </del>	0.37	U		***	•	
SO <sub>2</sub>		000			0.06	0.28	0.25		0.25	U				
NOx	• • • • • • • • • • • • • • • • • • • •	000			0.88	6.99	3.85		3.85	U				
CO		000			0.92	6.40	4.04		4.04	U		ļ		
VOC Total		021	95.0%		0.21	0.28	0.92	ļ	0.92	Ü		ļ	****	
Chlorine		000		7782-50-5	0.004	0.03	0.02	<b> </b>	0.02	U				
Hydrochloric a	acid	000		7647-01-0	0.08	0.52	0.36	ļ	0.36	U				
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		***		<u> </u>	•	State o	f Louisiana	1						Date of Sub	mittal
				Emissions I	Inventory	Quest	ionnaire (E	IQ) f	or Air Pol	lutants			-	September	r 2012
Emission Point ID			Descriptiv	e Name of the En	nissions Sou	irce (Alt.	Name)			Approximate Loc			Vent (see	•	
24 TEMPO Subject Item EQT 0149			0	leum Barge Lo	oading Sc	rubber			Method UTM Zone Latitude Longitude	28 - "GPS-L 15 Horizontal 30 degrees -91 degrees	673, 30	,311 mE min 46 min 37			<del></del>
Stack and Discharge Physical Characteristics Change?	Diameter Stack Disch Area 0.33	harge Abo	ht of Stack ove Grade 12.5 ft	Stack Exit Velocity 38 ft/sec	Stack Gas at Condition not at Stan 200	ons, S idard	tack Gas Exit Temperature	Ope	Normal rating Time rs per year) 400	Date of Construc or Modificatio		Percent Jan - Mar 25%	This Em	Throughput ission Point Use Jul - Sep	through Oct - Dec 25%
Yes		ft²	(see instruc	lione)		<u>_</u>			Operating	Parameters (incl	ıde uı	nits)			
Fuel Type of		Tical Input	Heat Input							/Parameter			Descri	otion	
a b c						Operating	ate/Throughpu Rate/Through		12.96	MMgal/уг gpm			oleu oleu		
<u> </u>		Notes			Shell Heigh		ume								
The PM10 and sulfurice is regulated as a TAP a	acid emission	ons are the	same emiss	ions; sulfuric acid	Tank Diame Roof Type										
Emission Point II	O No.				Air Pol	lutant S	Specific Info	rmati	on						
(Alternate ID	)	Control Equipment Code	Control Equipment Efficiency	HAP/TAP CAS Number	Propos Average (lb/hr)	ed Emis Maximu (lb/hr		Emi	ermitted ssion Rate tons/yr)	Add, Change, Delete, or Unchanged	Co	ontinuous ompliance Method	Concent	ration in Gase Stack	es Exiting at
Pollutant			20.00/					`			ļ				
PM1.	1	001	99.0%	7664-93-9	0.004	0.01	<0.01 <0.01	-	<0.01	A U	<u> </u>				
Sulfuric acid		001	99.0%	7664-93-9	0.004	0.01	\0.01	<del> </del>	<u> </u>	0	<del> </del>		<del>                                     </del>		<del></del> ,
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	<u>.</u>		·				State of	Louisiana				<u> </u>	Date of Sub	mittal
					Emissions I	Inventory	Questic	onnaire (E	Q) for Air Pe	oilutants			September	r 2012
	Emission Point ID			Descriptiv	e Name of the En	nissions Sou	rce (Alt. N	lame)		Approximate Loca	ation of Stack or	Vent (see i	nstructions)	
	27								Method UTM Zon	28 - "GPS-U		Datum Vertica	·	D 83 97 mN
TE	MPO Subject Iten	n ID No.	1	ACII	D PLANT VAP	OR COM	BUSTOF	₹	Latitude	30 degrees	30 min 36	sec 0	hundredths	,
	EQT151								Longitude	-91 degrees	11 min 13	sec 44	_ nunareams	<b>'</b>
	and Discharge Physical paracteristics	Diamete Stack Disc Area	harge A	eight of Stack bove Grade	Stack Exit Velocity	Stack Gas at Condition	ons, Sta	ack Gas Exit emperature	Normal Operating Time (hours per year	or iviodification	นอก	This Emi	Throughput ssion Point Jul - Sep	
	Change? Yes	4.6 N/A	ft	35 ft	21.7 ft/sec	21,500	ft³/min	1,520 °F	8760	December 200		25%	25%	25%
				ut (see instruc	tions)				Operati	ng Parameters (inclu	I ide units)	1		1
Fuel	Type		I TOUR III		(MM Btu/hr)					ıe/Parameter	,	Descrip	tion	
a		al Gas			.2	Normal Op	erating Rat	te/Throughpu		5 MMBTU/hr	Natu		aste vent ga	s
b		ent Gas			.2			Rate/Through		5 MMBTU/hr			aste vent ga	
С				•		Design Car		_					<del> </del>	·
<u> </u>			Notes			Shell Heigh	it (ft)							
Refer	to process group	"Spent Aci	d Process	" for speciated	VOC TAPs	Tank Diam			i i					
	Emission Point II	D No.				Air Pol	lutant Sr	pecific Infor	mation	······································			<del></del>	
	(Alternate ID						ed Emissi							
	27	•	Control Equipme Code	1	HAP/TAP CAS Number	Average	Maximun	n Annual	Permitted Emission Rate	Add, Change, Delete, or Unchanged	Continuous Compliance Method	Concentr	ation in Gase Stack	es Exiting at
	Pollutant		- Coue	Linciency		(lb/hr)	(lb/hr)	(tons/yr)	(tons/yr)	Unchanged	Metriod			
	PM10		000			0.02	0.06	0.07	0.03	С				
	SO <sub>2</sub>		000			0.01	0.40	0.04	0.04	U				
	NOx		000			0.29	6.89	1.29	1.29	С				
	ÇO		000			1.69	15.13	7.40	7.40	U				
	VOC Total		021	95.0%		0.45	7.64	1.95	1.95	U				
	Chlorine		000		7782-50-5	0.005	0.11	0.02	0.02	U		ļ		
	Hydrochloric a	ıcid	000		7647-01-0	0.09	2.24	0.39	0.39	U	<del></del>	<u> </u>		
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					5	State of	Louisiana	ì						Date of Sub	mittal
				Emissions I	Inventory	Questic	nnaire (E	IQ) f	or Air Pol	lutants				September	2012
Emission Point II (Alternate ID			Descriptiv	e Name of the En	nissions Sou	rce (Alt. Na	ame)			Approximate Loc	ation	of Stack or	Vent (see in	structions)	
Fug-Acid	·								Method UTM Zone	28 - "GPS-L 15 Horizontal		cified ,000 mE	Datum Vertical		⊃83 00 mN
TEMPO Subject Iter	π ID No.		A	Acid Plant Fug	itive Emiss	sions			Latitude	30 degrees	30	min 36	sec _26	hundredths	
FUG 0002	2								Longitude	-91 degrees	11			hundredths	
Stack and Discharge Physical	Diameter Stack Disch	arge Hei	ght of Stack	Stack Exit	Stack Gas I at Condition	ne Sta	ck Gas Exit		Normal rating Time	Date of Construction		Percent		Throughput i	through
Characteristics	Area		ove Grade	Velocity	not at Stand	dard	mperature	(hou	rs per year)	or wodincatio	"	Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
Change? No	NA NA		NA ft	NA ft/sec	NA t	ft³/min	NA °F		8760			25%	25%	25%	25%
		Heat Inpu	t (see instruc			· · ·				Parameters (inclu	ıde ur	nits)			
Fuel Type	of Fuel		Heat Input	(MM Btu/hr)					Value	/Parameter			Descrip	tion	
а					4	_	Throughpu								
b					4		ate/Through	put					• • •		
<u> </u>					Design Cap		ne								
		Notes	_		Shell Height										
Refer to process group					Tank Diame	eter (1t)									
PM10 and sulfuric acid regulated as a TAP and		re the san	ne emissions;	sulturic acid is	Roof Type										
Emission Point II	D No.				Air Poll	utant Sp	ecific Info	rmati	ion						
(Alternate IC	))					ed Emissio		T		Add Ohomes		ntinuous			
Fug-Acid	I	Control Equipmen Code	Control t Equipment Efficiency	HAP/TAP CAS Number	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	Emi	ermitted ission Rate (tons/yr)	Add, Change, Delete, or Unchanged	Co	mpliance Method	Concentra	ation in Gase Stack	es Exiting at
Pollutant						(1-2.1.1.7	` - '	<u> </u>	( <i>j</i> .,						
PM <sub>10</sub>		000			0.10		0.46			Α					
SO <sub>2</sub>	_	000			0.31		1.38	<u> </u>	1.38	U					
VOC Total		000			0.15		0.65	ļ	0.65	U					
Sulfuric acid	1	000		7664-93-9	0.10		0.46	├	0.46	U					
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## PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

Instructions: Complete this checklist and submit with the completed air permit application.

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit Application	Yes	No	NA	Location Within the Permit Application
517.A Timely Submittal	Was a Copy of the Application Also Submitted to EPA?	•.	0	0	
517.B.1,2 Certification	Does the Application include a Certification by a Responsible Official?	•	0	0	AAE - Section 10
517.B.3 Certification	Does the Application Include Certification by a Professional Engineer or their Designee:	•	0	0	AAE - Section 10
517.D.1 Identifying Information	Does the Application Include:				
	1. Company Name, Physical and Mailing Address of Facility?	•	0	0	AAE - Section 2
	2. Map showing Location of the Facility?	•	0	0	Appendix A
	3. Owner and Operator Names and Agent?	•	0	0	AAE - Section 1
	4. Name and Telephone Number of Plant Manager or Contact?	•	0	0	AAE - Section 11
517.D.2 SIC Codes, Source Categories	Does the Application Include a Description of the Source's Processes and Products?	0	0	•	No change from current permit
	Does the Application Include the Source's SIC Code?	•	0	0	AAE - Section 5
	Does the Application Include EPA Source Category of HAPs if applicable?	0	0	•	
517.D.3,6 EIQ Sheets	Has an EIQ Sheet been Completed for each Emission Point whether an Area or Point Source?	•	0	0	AAE - Section 24
517.D.4 Monitoring Devices	Does the Application Include Identification and Description of Compliance Monitoring Devices or Activities?	0	•	0	No change from current permit
517.D.5 Revisions and Modifications Only	For Revisions or Modifications, Does the Application include a Description of the Proposed Change and any Resulting Change in Emissions?	•	0	0	AAE - Sections 2, 12, 24
517.D.7 General Information	Does the Application Include Information Regarding Fuels, Fuel Use, Raw Materials, Production Rates, and Operating Schedules as necessary to substantiate emission rates?	•	0	0	Appendix B
517 D.8 Operating Limitations	Has Information Regarding any Limitations on Source Operation or any Applicable Work Practice Standards been Identified?	0	0	•	No change from current permit
517.D.9 Calculations	Are Emission Calculations Provided?	•	0	0	Appendix B
517.D.10 Regulatory Review	Does the Application Include a Citation and Description of Applicable Louisiana and Federal Air Quality Requirements and Standards?	0	0	•	No change from current permit

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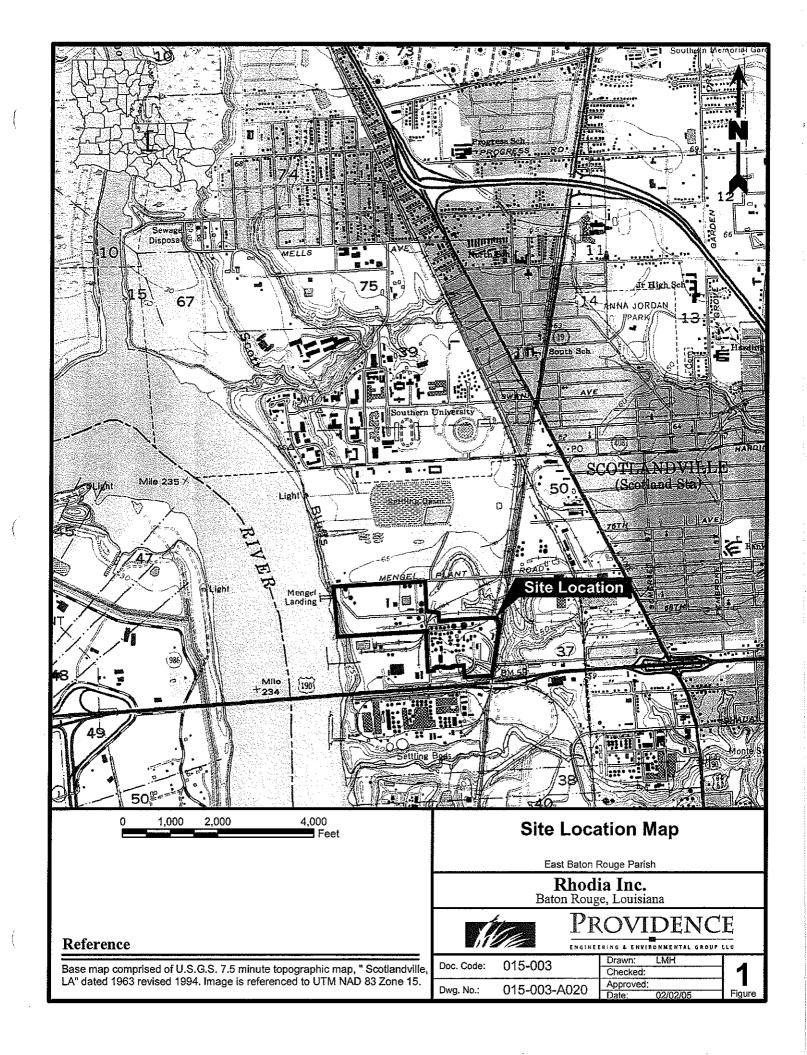
# PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
517.D.11 Test Methods	Has a Description of or a Reference to Applicable Test Methods Used to Determine Compliance with Standards been Provided?	0	0	•	No change from current permit
517.D.12 Major Sources of TAPs	Does the Application include Information Regarding the Compliance History of Sources Owned or Operated by the Applicant (per LAC 33.III.5111)?	0	0	•	
517.D.13 Major Sources of TAPs	Does the Application include a Demonstration to show that the Source Meets all Applicable MACT and Ambient Air Standard Requirements?	•	0	0	Appendix C
517.D.14 PSD Sources Only	If Required by DEQ, Does the Application Include Information Regarding the Ambient Air Impact for Criteria Pollutants as Required for the Source Impact Analysis per LAC 33:III.509.K, L, and M?	0	0	•	
517 D.15 PSD Sources Only	If Required by DEQ, Does the Application Include a Detailed Ambient Air Analysis?	0	0	•	
517.D.16, 18	Has any Additional Information been Provided?	0	•	0	
517.D.17 Fees	Has the Fee Code been Identified?	•	0	0	AAE - Section 5
	Is the Applicable Fee Included with the Application?	•	0	0	
70 Requirements	Does the Certification Statement Include a Description of the Compliance Status of Each Emission Point in the Source with All Applicable Requirements?	•	0	0	AAE - Section 10
	Does the Certification Statement Include a Statement that the	•	0	0	AAE - Section 10
70 Requirements 517.E.3 Additional Part 70 Requirements	Source will continue to Comply with All Applicable Does the Certification Statement Include a Statement that the Source will, on a timely basis, meet All Applicable Requirements that will Become Effective During the Permit Term?	•	0	0	AAE - Section 10
517.E.4 Additional Part 70 Requirements	Are there Applicable Requirements for which the Source is not in Compliance at the Time of Submittal?	0	•	0	
	Does the Application include a Compliance Plan Schedule?	0	0	•	
	Does the Schedule Include Milestone Dates for which Significant Actions will occur?	0	0	•	
	Does the Schedule Include Submittal Dates for Certified Progress Reports?	0	0	•	1
517.E.5 Additional Part 70 Requirements Acid	Is this Source Covered by the Federal Acid Rain Program?	0.	•	0	·
Rain	Are the Requirements of LAC 33.III.517.E 1-4 included in the Acid Rain Portion of the Compliance Plan?	0	0	•	

# PART 70 OPERATING PERMIT APPLICATION COMPLETENESS CHECKLIST

LAC 33:III.	Completeness Questions Relative to the Part 70 Permit	Yes	No	N/A	Location Within the
	Have any Exemptions from any Applicable Requirements been Requested?	0	•	0	No new exemption requests
	Is the List and explanations Provided?	0	0	•	
517.E.7 Additional Part 70 Requirements	Does the Application Include a Request for a Permit Shield?	0	•	0	No new shield requested
	Does the Request List those Federally Applicable Requirements for which the Shield is Requested along with the Corresponding Draft Permit Terms and conditions which are Proposed to Maintain Compliance?	0	0	•	
517.E.8 Additional Part 70 Requirements	Maintain Compliance? Does the Application Identify any Reasonably Anticipated Alternative Operating Scenarios?	0	•	0	
	Does the Application include Sufficient Information to Develop permit Terms and Conditions for Each Scenario, Including Source Process and Emissions Data?	0	0	•	
517.F Confidentiality	Does the Application Include a Request for Non-Disclosure (Confidentiality)?	0	•	0	
525.B. Minor Permit Modifications	Does the Application Include a Listing of New Requirements Resulting for the Change?	0	0	•	No new requirements
·	Does the Application Include Certification by the Responsible Official that the Proposed Action Fits the Definition of a Minor Modification as per LAC 33:III.525.A.	•	0	0	cover letter
	Does the Certification also Request that Minor Modification Procedures be Used?	•	0	0	cover letter
	Does the Application, for Part 70 Sources, Include the Owner's Suggested Draft Permit and Completed Forms for the Permitting Authority to Use to Notify Affected States?	0	0	•	
La. R.S. 30:2018 – PSD/NNSR only	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to the local governing authority at no cost to the local governing authority?	0	0	•	
	Has a copy of the answers to the questions posed in the Environmental Assessment Statement (Section 25) been sent to the designated public library at no cost to the designated public library?	0	0	• .	

# Appendix A Site Location Map



# Appendix B Emission Calculations

#### **TS-Proc Process Group**

Emissions of TAP/HAPs (other than HCl, Cl2, and metals) from processing TS streams

Assumed % of total VOCs that are TAP/HAP =

50%

(except as noted for Unit 1 and Unit 2)

EIQ ID	Source Description	total VOCs tpy	total HAPs tpy *
	Unit 1 + Unit 2	see note	0.052
21	TS Vapor Combustor	0.920	0.460
Fug-TS	TS Fugitives	2.944	1.472
M3	TS Sumps	0.073	0.036
Total TAPs	for Process		2.021

<sup>\*</sup> Excluding HCI, Cl2, metals

Note: Unit 1 and Unit 2 are calc'd below (not as % of total VOCs b/c total VOCs are mostly from natural gas combustion):

45,000

TPY, max TS annual feed rate

100%

Max percent of total TS feeds that are TAP/HAP compounds

727,810

TPY, max spent acid annual feed rate

1%

Max percent of spent acid that is TAP/HAP compounds (liquid phase)

99.9999% DRE

0.052

TPY total HAP/TAP

Spt-Proc Process Group
Emissions of TAP/HAPs (other than HCl, Cl2, and metals) from processing spent streams

Assumed % of total VOCs that are TAP/HAP =

10%

EIQ ID	Source Description	total VOCs tpy	HAPs tpy *
26	Spent Acid Barge Loading Scrubber	0.931	0.093
27	Acid Plant Vapor Combustor	1.950	0.195
Fug-Acid	Acid Plant Fugitives	0.650	0.065
M4	West End Sump	0.138	0.014
M7	001 Wastewater Treatment Unit	1.909	0.191
Total			0.558

<sup>\*</sup> Excluding HCl and Cl2

#### Summary

Rhodia is area source for HAPs (<25 TPY total HAPs, <10 TPY each HAP) Rhodia is major source for TAPs (>10 TPY for sulfuric acid) Rhodia exceeds MERs (based upon proposed permitted annual emissions) for:

sulfuric acid HCl Cl2 MIBK H<sub>2</sub>S antimony (and compounds) arsenic (and compounds) barium (and compounds) chromium VI (and compounds) copper (and compounds)

manganese (and compounds) nickel (and compounds) selenium (and compounds) zinc (and compounds)

#### Total HAPs (compare to 25 tpy)

Source - Pemitted HAPs	Proposed Permit Limits (tpy)
Unit 1&2 (Cap-SAU) - HAP metals	0.404
Unit 1&2 (Cap-SAU) - HCl, Cl <sub>2</sub>	5.29
Sulfur Feed Tank- COS+CS <sub>2</sub>	0.29
TS Vapor Combustor - HCI and Cl <sub>2</sub>	0.38
AP Vapor Combustor - HCl and Cl <sub>2</sub>	0.41
Gasoline Tank	0.06
TS Process - total TAPs	2.02
Spent Acid Process - total TAPs	0.56
CathyVal MIBK per V3 permit	9.46
CathyVal Other HAPs per V3 permit	4.42
CVAL GCXVII per V3 permit	0.34
Total Acid Plant	9.41
Total CVAL Plant	14.22
TOTAL Overall	23.63

Individual TAP/HAPs (compare to 10 tpy for HAPs) (compare to MERs for TAPs)

	Proposed Permit Limits (tpy)  TAPs that are not HAPs							
Source	H₂SO₄	H <sub>2</sub> S	barium (and compounds)	copper (and compounds)	zinc (and compounds)			
Unit 1&2 (Cap-SAU)	41.90		0.181	0.111	0.220			
Oleum Loading Vent Scrubber	0.002	_	_					
Oleum Barge Loading Scrubber	0.001	-						
Sulfur Feed Tank		2.16						
TS Vapor Combustor		1						
AP Vapor Combustor	-			_				
Gasoline Tank	_			_				
Fug-Acid	0.46	-		_	_			
Spent Acid Process	-	0.01						
TS Process		0.04						
Acid Plant GCXVII	0.11	_	_					
CathyVal per V3 permit				_				
CVAL GCXVII per V3 permit	_							
TOTAL, tpy	42.47	2,21	0.18	0.11	0.22			
TOTAL, Ibs/yr	84,942	4,420	362	222	440			
MER, lbs/yr	75	1000	37.5	25	200			

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process. These limits were intentionally calculated to be <= 95% of the MER.

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Individual TAP/HAPs (compare to 10 tpy for HAPs) (compare to MERs for TAPs)

		Proposed Permit Limits (tpy) TAPs/HAPs													
					antimony (and	arsenic (and	beryllium (and	cadmium (and	chromium VI (and	cobalt (and	lead	manganese (and	mercury (and	nickel (and	selenium (and
Source	HCI	Cl <sub>2</sub>	CS <sub>2</sub>	cos	compounds)	compounds)	compounds)	compounds)	compounds)	compounds)	compounds	compounds)	compounds)	compounds)	compounds)
Unit 1&2 (Cap-SAU)	3.59	1.70	1	1	0.032	0.022	0.012	0.012	0.030	0.03	0.08	0.080	0.012	0.038	0,056
Oleum Loading Vent Scrubber		1	Ī	1	_		_								
Oleum Barge Loading Scrubber			-	•					_	_	1				
Sulfur Feed Tank		-	0.29	0,001	1	-						_			
TS Vapor Combustor	0.36	0.02	1	1						-					<u> </u>
AP Vapor Combustor	0.39	0.02	-												
Gasoline Tank		_	1	1		-		-							<u> </u>
Fug-Acid			8-9											<u> </u>	<u></u>
Spent Acid Process															
TS Process	-				<u> </u>										
Acid Plant GCXVII															
CathyVal per V3 permit							<u> </u>			_	-			-	
CVAL GCXVII per V3 permit	-	<u> -</u>			<u></u>								-		
TOTAL, tpy	4.34	1.74	0.29	0.001	0.03	0.02	0.01	0.01	0.03	0.03	0.08	0.08	0.01	0.04	0.06
TOTAL, lbs/yr	8,680	3,480	580	2	64	44	24	24	60	60	160	160	24	76	112
MER, lbs/yr	500	100	2400	1000	37.5	25	25	25	25	sup	sup	75	25	25	25

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process. These limits were intentionally calculated to be <= 95% of the MER.

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		Proposed Permit Limits (tpy) TAPs/HAPs											
Source	MIBK	methanol	chloroethane	methyl chloride	phenol	hydroquinone	pyro- catechol	n-hexane	benzene	toluene	2,2,4- trimethyl pentane	ethyl- benzene	xylenes
Unit 1&2 (Cap-SAU)								-					<b></b>
Oleum Loading Vent Scrubber				-									
Oleum Barge Loading Scrubber							-				<b></b>	-	
Sulfur Feed Tank										-			
TS Vapor Combustor					-		-						
AP Vapor Combustor													
Gasoline Tank		-						0.01	0.01	0.01	0.01	0.01	0.01
Fug-Acid													
Spent Acid Process	0.01	0.50	0.50	0.39	0.02	0.50	0.50	0.50	0.01	0.50	0.50	0.50	0.50
TS Process	0.01	0.50	0.50	0.50	0.16	0.50	0.50	0.50	0.10	0.50	0.50	0.50	0.50
Acid Plant GCXVII				_									
CathyVal per V3 permit	9.46	3.38	0.12	0.23	0.39	0.09	0.21						
CVAL GCXVII per V3 permit	0.04	0.04	0.04	0.04	0.06	0.05	0.07						
TOTAL, tpy	9.48	4.38	1.12	1.12	0.57	1.09	1.21	1.01	0.12	1.01	1.01	1.01	1.01
TOTAL, lbs/yr	18,960	8,760	2,240	2,240	1,140	2,180	2,420	2,020	240	2,020	2,020	2,020	2,020
MER, lbs/yr	15,000	20,000	20,000	7750	1400	NA - sup	NA - sup	13,000	260	20,000	NA - sup	20,000	20,000

TAPs/HAPs not listed in this table are permitted only in TS Process and Spent Acid Process. These limits were intentionally calculated to be <= 95% of the MER.

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# Preheater; Acid Unit No. 1 EIQ 10

Op. Schedule<sup>1</sup> =

8760 hrs per year

Max Firing Rate<sup>2</sup> =

5.6 MSCFhr

Stack Flow =

13,300 DSCFM (Weston, 2012)

Stack Flow =

26,500 WACFM (Weston, 2012)

Stack Temp =

550 degF (Weston, 2012)

Stack Height =

62 feet above grade (new stack ~March 2013)

Stack Diameter =

42 inches (new stack ~March 2013)

Stack Velocity =

46 ft/sec (new stack)

Stack CSA =

9.621 ft2

Pollutant	Emission Factor (lb/MMscf) <sup>3</sup>	Average Emissions (lbs/hr)	Maximum Emissions (lbs/hr)	Annual Emissions (tpy)
PM-10	7.6	0.04	0.04	0.19
Sulfur Dioxide	0.6	0.003	0.003	0.01
Nitrogen Oxides	100	0.56	0.56	2.45
Carbon Monoxide	84	0.47	0.47	2.06
VOCs	5.5	0.03	0.03	0.13

#### Notes:

<sup>&</sup>lt;sup>1</sup> Conservative estimate of operating schedule per Fred Buchmann

<sup>&</sup>lt;sup>2</sup> Maximum firing rate per Sam Magee, verified 12/17/01.

<sup>&</sup>lt;sup>3</sup> AP-42 Section 1.4, Natural Gas Combustion, 7/98. Note: Factors for Small Boilers (<100 MMBtu/hr) were used. NOx emissions were assumed to be uncontrolled.

#### Sulfur Feed Tank EIQ 20

#### **Basis and Assumptions**

- 1. Molten sulfur is brought onsite and unloaded into the 150-gal sulfur unloading tank. After the desired tank level is reached, the molten sulfur is simultaneously pumped out of the unloading tank into the sulfur feed tank keeping a constant level in the unloading tank.
- 2. The vapor space of the sulfur unloading tank vents into the sulfur feed tank; the sulfur feed tank vents to the atmosphere.
- 3. Working-loss emissions from the sulfur feed tank are estimated using the concentration of  $H_2S$ ,  $SO_2$ ,  $CS_2$ , and COS in the vapor space and multiplying by the net vapor displacement from the sulfur feed tank while unloading. Net vapor displacement while unloading is assumed to be (gpm unloading rate gpm feed rate to Units 1&2 + an additional 150 gals from each truck unloaded to account for the additional vapors from the initial filling of the sulfur unloading tank). Emissions are assumed to be zero when not unloading because of minimal vapor flow and Weston testing indicates that concentrations are non-detect shortly after unloading stops.

#### **Concentration Data**

	H <sub>2</sub> S	SO <sub>2</sub>	CS <sub>2</sub>	COS <sup>2</sup>	cos
	ppmv	ppmv	ppmv	ppmw	ppmv
Baton Rouge, 1999 testing above old sulfur pit	2	50	NA	NA	NA
Houston, sulfur tank, while unloading	2907	2.2	45.5	NA	NA
Baton Rouge, 2012, while unloading, avg <sup>1</sup>	32872	297	1954	21.4	10.3
Baton Rouge, 2012, while unloading, max <sup>1</sup>	38514	995	3478	23.9	11.5

<sup>&</sup>lt;sup>1</sup>Probe in gooseneck of main tank. Testing by Weston, verified via bag samples to Sherry Labs. Except for COS, used Weston results (higher) instead of Sherry results. Used Sherry results for COS since Weston did not test for it. Weston results are ppmvd; this calc treats as if not moisture corrected (conservative).

#### Input Data

Molten Sulfur Temperature

284 °F

744 °R

Molten Sulfur Density

1.79 SG

111.70 lb/ft<sup>3</sup> or

14.93 lbs/gal

<sup>&</sup>lt;sup>2</sup>COS is carbonyl sulfide, Sherry reported as ppmw.

#### Sulfur Feed Tank EIQ 20

Sulfur Usage / Feed Rate 670 tpd (max at debottlenecked rates) 32,753,796 gals/yr 62.32 gpm

Truck Unloading Data 22 long tons per truck

2240 lbs per long ton 3300 gals/truck 9925 trucks/year

30 minutes to unload one truck

110 gpm unload rate

4962 hours per year unloading time

Universal Gas Constant (R) = 0.7302 ft<sup>3</sup>\*atm / lb-mol\*R

#### Calc Net Vapor Displacement (for annual emissions)

Add Sulfur unloaded
Add Add'l displacement from unloading tank
Subtract feed to units
Net vapor displacement

150 gals/truck
150 gals/truck
1581 gals/truck
211 ft³/truck
2,097,301 ft³/yr

#### Calc Gross Vapor Displacement (for max hourly emissions)

Add Sulfur unloaded

Add Add'l displacement from unloading tank

Gross/max vapor displacement

Max trucks per hour

3300 gals/truck

150 gals/truck

3450 gals/truck

2.0 trucks/hr

923 ft³/hr max

#### Calc Stack Characteristics (for EIQ form):

Stack Diameter1.2 feetStack Gas Flow15.4 ft³/minStack Gas Velocity13.6 ft/sec

#### Sulfur Feed Tank EIQ 20

**Proposed Permit Emission Rates** 

				<del></del>		
	MW	avg ppmv	max ppmv	tpy	max lbs/hr	avg lbs/hr
H₂S (TAP, >MER)	34.1	32872	38514	2.16	2.23	0.49
SO₂	64.1	297	995	0.04	0.11	0.01
CS <sub>2</sub> (TAP&HAP, <mer)< td=""><td>76.1</td><td>1954</td><td>3478</td><td>0.29</td><td>0.45</td><td>0.07</td></mer)<>	76.1	1954	3478	0.29	0.45	0.07
COS (TAP&HAP, <mer)< td=""><td>60.1</td><td>10.3</td><td>11.5</td><td>0.001</td><td>0.0012</td><td>0.00</td></mer)<>	60.1	10.3	11.5	0.001	0.0012	0.00
total VOC (∑ CS₂, COS)				0.29	0.45	0.07

# Acid Plant Vapor Combustor EIQ 27

Stack	Data
-------	------

 Stack Flow =
 5,300 DSCFM (Weston, 2009)

 Stack Flow =
 21,500 WACFM (Weston, 2009)

 Stack Temp =
 1,520 degF (Weston, 2009)

 Stack Height =
 35 feet above grade

 Stack Diameter =
 55 inches (back calc'd from Weston 2009 stack CSA)

 Stack Velocity =
 21.7 ft/sec

 Stack CSA =
 16.5 ft2

#### Description

The caustic scrubber (EIQ 13) and Acid Plant Vapor Combustor (APVC) operating in series are the backup control device for the spent acid storage tanks in the tankfarm (primary control device is Unit 1 furnace); other minor sources include the IFS Mix Tank, IFS railcar cleaning, and venting of railcars after they are pressure unloaded. The caustic scrubber provides SO<sub>2</sub> control and the APVC provides VOC control. As a backup to the Unit 1 furnace, the scrubber/APVC operate about 25% of the year. However, the pilot flame on the combustor is always lit. Thus, the operating schedule is shown as 52 weeks per year, but the majority of the emissions occur during 25% of the year.

Hours in Standby/Pilot:	6570	hours
Hours Controlling Emissions:	2190	hours
Natural Gas, Pilot		
SCFM	1.0	
MMSCF/hr	0.0001	
Natural Gas, Assist Gas		
SCFM	132	
BTU/SCF	1040	
MMBTU/hr	8.24	
MMSCF/hr	0.008	
Vent Gas, Max:		
lbs/hr	152.88	max from Dec 2001 test
BTU/lb	21221	assume butane
MMBTU/hr	3.24	
TOTAL MMBTU/hr when venting	11.48	·
Overall avg MMBTU/hr	5.35	(weighted avg of pilot and venting time, for EIQ form)

#### Acid Plant Vapor Combustor EIQ 27

#### **Emission Summary:**

	AP-42 Factor	AP-42 Factor John Zink Factor		Avg When Venting (25%)		Avg in Pilot (75%)		Maximum		Annual
	lbs/MMSCF <sup>1</sup>	lbs/MMBTU <sup>3</sup>	lbs/hr	Ref	lbs/hr	Ref	lbs/hr	lbs/hr	Ref	TPY
PM <sub>10</sub>	7.6		0.06	4a	0.00046	4b	0.02	0.06	4a	0.07
CO	84		6.74	6	0.00504	4b	1.69	15.13	8	7.40
NOx	100	0.60	1.16	6	0.00600	4b	0.29	6.89	7	1.29
SO <sub>2</sub>	0.6		0.04	8	0.00004	4b	0.01	0.40	9	0.04
HCI			0.35	12			0.09	2.24	12	0.39
chlorine			0.02	12			0.005	0.11	12	0.02
Total VOC	5.5		1.78	8	0.00033	4b	0.45	7.64	10	1.95

#### References

- 1. AP-42 Section 1.4, Natural Gas Combustion, 7/98, Factors for Small Boilers (<100 MMBtu/hr).
- 3. Factor provided by John Zink "typical high" for vapor combustors.
- 4a. AP-42 Factor and max natural gas firing rate.
- 4b. AP-42 Factor and pilot natural gas firing rate.
- 6. Average of June 2010 test results, 2 of the 4 runs were during barge unloading (max rates).
- 7. John Zink Factor and max MMBTU/hr (natural gas + vent).
- 8. Maximum stack test result to date (from Sept 2009, while unloading a barge).
- 9. Estimate as 10X the average rate when venting.
- 10. Apply 95% control to max uncontrolled VOC rate

iv. Apply 33 % control to ma	ix difficulted VOO fate	
12. Estimate as follows:	VOCs vented, max lbs/hr (max of all data on combustor inlet)	152.88
	VOCs vented, avg lbs/hr (avg of all data on combustor inlet)	72.59
	% of VOCs vented that are chlorinated organics, max	1.50%
	% of VOCs vented that are chlorinated organics, average	0.50%
	DRE of chlorinated organics	100%
	% converted to HCI	95%
	% converted to CI2	5%

## Appendix C

#### **LA MACT Standards**

MACT is required for Class I and II TAPs that are permitted site-wide above their respective minimum emission rates (MERs). The application does not propose to change any emission rates of class I or II TAPs, thus no new MACT determinations are needed. Additionally, there is no change to the existing MACT determinations with this permit application.

#### LA Ambient Air Standards

This permit application proposes to increase the site-wide emission rate for the Class III TAP hydrogen sulfide to a level above its MER (from 980 lbs/yr to 4420 lbs/yr; the MER is 1000 lbs/yr). Rhodia conducted modeling to assess the impact of increased emission on the predicted ambient air concentrations. The modeling did not predict any exceedances (maximum 265 µg/m3 versus the standard of 330 µg/m3). A modeling report will be submitted to LDEQ upon request.